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IMPRINT

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**Editors**  
Anja Brauner, Pankl Racing Systems AG  
Lena Angerer, Pankl Racing Systems AG

**Design**  
Morris Pock, Pankl Racing Systems AG

**Photos**  
Lucas Kundigraber, Pankl Racing Systems AG  
Morris Pock, Pankl Racing Systems AG  
Adobe Stock

**Contact**  
Lena Angerer  
+43(0)3862 33 999-0  
ir@pankl.com  
www.pankl.com

Anja Brauner  
sustainability@pankl.com  
www.pankl.com

**Gender-Note**  
For the sake of readability, the male and female forms may be used  
alternately. All references to persons apply equally to all genders.



Pankl AG is a leading international automotive and aerospace supplier. With its 4,154 highly qualified employees at 21 locations worldwide, it develops, produces, and distributes high-precision individual components and complete system solutions. The company serves a wide range of demanding markets, including racing, luxury cars, passenger cars, aerospace, truck & off-highway, two-wheelers, and industrial applications. Due to the reporting obligations of the parent company of Pankl AG, this non-financial statement complies with the requirements of the ESRS. Starting in 2024, Pankl AG will report for the first time in accordance with the European Sustainability Reporting Standards (ESRS), having previously aligned its sustainability reporting with the GRI Standards. This innovation represents an important step towards communicating the corporate strategy and its sustainability goals even more transparently and effectively. Reporting remains voluntary.

The values of Pankl AG are deeply embedded in the corporate culture and shape the actions of all employees worldwide. With a strong focus on teamwork and local responsibility, employees make a significant contribution to the company's success and dynamic development. Their professionalism, passion, and entrepreneurial spirit are the driving forces that enable Pankl AG to seize opportunities and drive targeted innovation. Excellent collaboration among employees, based on trust and mutual respect, forms the foundation of the company. These shared core values guide every aspect of our actions and are not only a promise to customers but also an internal drive for continuous improvement and excellence in all areas.

Pankl AG's vision is to develop market-leading technical systems that not only meet today's needs but also set the standards of the future. In a world characterized by rapid technological change, Pankl AG relies on continuous research and development to always secure a decisive technological advantage. The group strives to be the fastest in all areas of its

business – be it product development, manufacturing, or the market launch of new innovations. This willingness to constantly improve and change is a central component of Pankl AG's corporate strategy and culture.

For Pankl AG, quality means not only perfection down to the smallest detail, but also the pursuit of long-term, trusting relationships with customers, business partners, and colleagues.

Pankl AG's strategic direction focuses on securing and expanding its technological leadership. This will be achieved through the continuous expansion of the product portfolio and the utilization of synergies within the Group. The expansion of internal manufacturing competencies and the further development of technologies in the field of electrification and alternative fuels are among the next steps on this path. A particularly significant milestone in 2024 was the development of a decarbonization strategy in line with the Paris Climate Goals. This strategy is a clear expression of Pankl AG's commitment to making an active contribution to combating climate change and reducing its CO<sub>2</sub> emissions in the long term.

Sustainability is not only a central objective of Pankl AG, but also an integral component of all business processes. From purchasing to product development to production, resource conservation and environmental awareness are taken into account at every step. Pankl AG pursues a clear and ambitious target path to significantly reduce the company's carbon footprint while simultaneously advancing the development of its products. This includes, among other things, promoting energy efficiency, the transition to renewable energies, and the use of resource-saving processes and materials. In this respect, Pankl Group understands sustainability not only as an ecological responsibility, but also as the key to securing long-term competitiveness. At the same time, the implementation of these sustainable practices meets society's expectations for responsible business practices.





## FOREWORD BY THE MANAGEMENT BOARD



DEAR STAKEHOLDERS,  
LADIES AND GENTLEMEN,

With this sustainability report, we would like to provide you with a comprehensive overview of Pankl Group's progress and challenges in the area of sustainability in 2024. As a leading international supplier of components for racing, the automotive industry, and aerospace, it is a matter of course for us to also assume responsibility with regard to ecological and social concerns. Sustainability is an integral part of our corporate strategy and is closely linked to our technological and economic goals.

The 2024 fiscal year presented Pankl Group with major economic challenges. The post-COVID growth phase abruptly transitioned into a recession, hitting Europe and the German-speaking region particularly hard. High energy and labor costs, as well as a general reluctance to invest, burdened the entire industry. We, too, were unable to escape the effects of this macroeconomic development—as well as the additional difficulties at our sister company KTM AG.

Despite a €30m decline in sales, we managed to close the year with a positive operating result and solid cash flow. The development in our future-oriented areas is particularly encouraging. Aerospace, racing, and aluminum forging technology recorded moderate growth and provide a stable foundation for 2025. Nevertheless, the outlook remains cautious. We expect an overall stable sales level and continue to exercise caution with regard to investments.

In parallel with the economic challenges, we also set important strategic directions in 2024. Among other things, we developed a decarbonization strategy that aims to contribute to a long-term reduction in our CO<sub>2</sub> emissions. Sustainability is not a short-term goal for us, but rather a component of corporate responsibility that we pursue pragmatically and with a sense of proportion. We are confident that through consistent action and the continuous involvement of our employees and partners in the implementation of our goals, we can continue to make a positive contribution in the future.

We would like to thank all our employees for their commitment and our stakeholders for their excellent co-operation. We look forward to continuing to engage with you in the future and thank you for your interest in our sustainability work.

Kapfenberg, in May 2025  
The Management Board of Pankl AG

  
Wolfgang Plasser  
Stefan Seidel  
Christoph Prattes  
Anton Hirschmann

## KEY FIGURES OF PANKL GROUP

EUR k	2024	2023
Revenues	890,034	936,192
EBITDA	81,489	95,686
EBITDA margin in %	9.2	10.2
EBIT	16,695	30,506
EBIT margin in %	1.9	3.3
Net result for the period	-54,856	6,932
Shareholders' equity	251,368	306,091
Shareholders' equity in % of total assets	30.3	34.8
Free Cash Flow	2,084	24,129
in % of revenues	0.2	2.6
Net debt	-323,320	-314,478
Capital expenditure	80,366	76,456
in % of revenues	9	8.2
Working capital employed	194,380	197,477
in % of revenues	21.8	21.1
ROCE in %	2.5	4.4

LEADERSHIP STRUCTURE

MANAGEMENT BOARD



CEO

Wolfgang PLASSER

was born in Upper Austria in 1962 and has been a member of the Management Board of Pankl Racing Systems AG since 2004. Since June 2018, he has been Chairman of the Management Board of SHW AG and Pankl AG.

CTO

Stefan SEIDEL

was born in Graz in 1976 and has been a member of the Management Board of Pankl Racing Systems AG since 2015 and of Pankl AG since 2024.

COO

Christoph PRATTES

was born in Graz in 1976 and has been a member of the Management Board of Pankl Racing Systems AG since 2015 and of Pankl AG since 2023.

COO

Anton HIRSCHMANN

was born in Kirchberg upon Raab in 1964 and has been a member of the Management Board of Pankl AG since 2021.

SUPERVISORY BOARD

Friedrich Roithner  
Member of the Supervisory Board  
First elected on 17 September 2018  
Current term ends in 2025

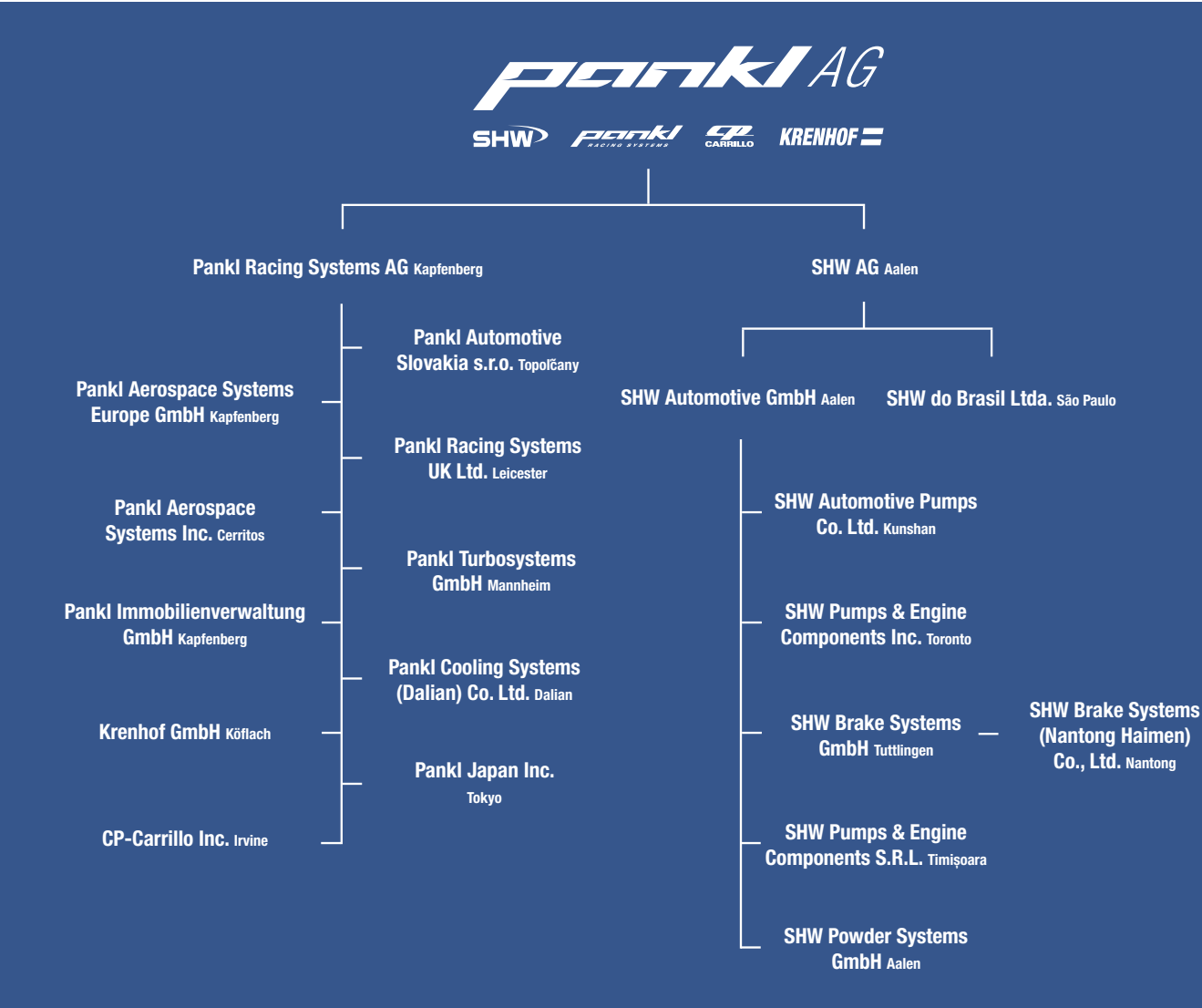
Stefan Pierer  
Chairman of the Supervisory Board  
First elected on 5 October 2018  
Current term ends in 2025

Josef Blazicek  
Member of the Supervisory Board  
First elected on 17 September 2018  
Current term ends in 2025

Klaus Rinnerberger  
Deputy Chairman of the Supervisory Board  
First elected on 1 July 2020  
Current term ends in 2025

Helfried Sorger  
Member of the Supervisory Board  
First elected on 18 May 2021  
Current term ends in 2025

GROUP STRUCTURE



## ESRS 2 GENERAL DISCLOSURES

Founded in 2018, Pankl AG (hereinafter "Pankl Group") is the parent company of the two globally operating companies: Pankl Racing Systems AG (hereinafter "Pankl Racing"), headquartered in Austria, and SHW AG (hereinafter "SHW"), headquartered in Germany. Pankl AG operates as a pure holding company.

### BASIS FOR THE PREPERATION

#### BP-1 – GENERAL PRINCIPLES FOR PREPARING THE SUSTAINABILITY STATEMENT

Pankl Group's 2024 Non-Financial Statement was prepared on a consolidated basis and includes the same scope of consolidation as the 2024 Consolidated Financial Statements. The reporting focuses on the activities of the entire Pankl Group. Where necessary or for better comprehensibility, relevant information along the upstream and downstream value chain is added.

Pankl Group's double materiality analysis covered the entire value chain, with particular attention to direct business partners. Detailed information on the value chain as well as on disclosed concepts, measures, and key performance indicators can be found in the respective topic chapters of the declaration.

While every effort was made to ensure the most complete presentation possible, particularly regarding the company's own business activities, the completeness of the qualitative information cannot be guaranteed without reservation, particularly with regard to future developments and company-specific know-how.

The European Sustainability Reporting Standards (ESRS) were applied on a voluntary basis, based on the legal situation in Austria applicable at the time the report was prepared.

#### BP-2 – INFORMATION RELATED TO SPECIFIC CIRCUMSTANCES

##### Estimates and uncertainties of results

In compiling the non-financial statement, the Group paid attention to the completeness and accuracy of the data provided. Where possible, it used primary data to calculate quantitative disclosures relating to its own business activities. Due to the limited availability of data in the upstream and downstream value chain and its high complexity, it was often not possible to use primary data for the analyses described in the topic standards. Further information on the calculation and estimation of the disclosures, as well as their certainty, can be found in conjunction with the disclosed data in the sections on valuation principles and assumptions.

##### Changes in the preparation or presentation of sustainability information

In this non-financial statement, the Group is reporting in accordance with ESRS for the first time. This represents a significant change compared to previous reporting in a separate sustainability report, which was based on the GRI (Global Reporting Initiative) Standards. This transition necessitated several changes to the reporting processes and methods, as well as to the data points to be collected. Due to the limited comparability of the information with the disclosures in previous periods, prior-year comparative figures are not included in the non-financial statement for the 2024 fiscal year.

In the EU Taxonomy reporting, minor adjustments to the reported figures were made due to reassessments or new findings. These are described in detail in the "EU Taxonomy" section.

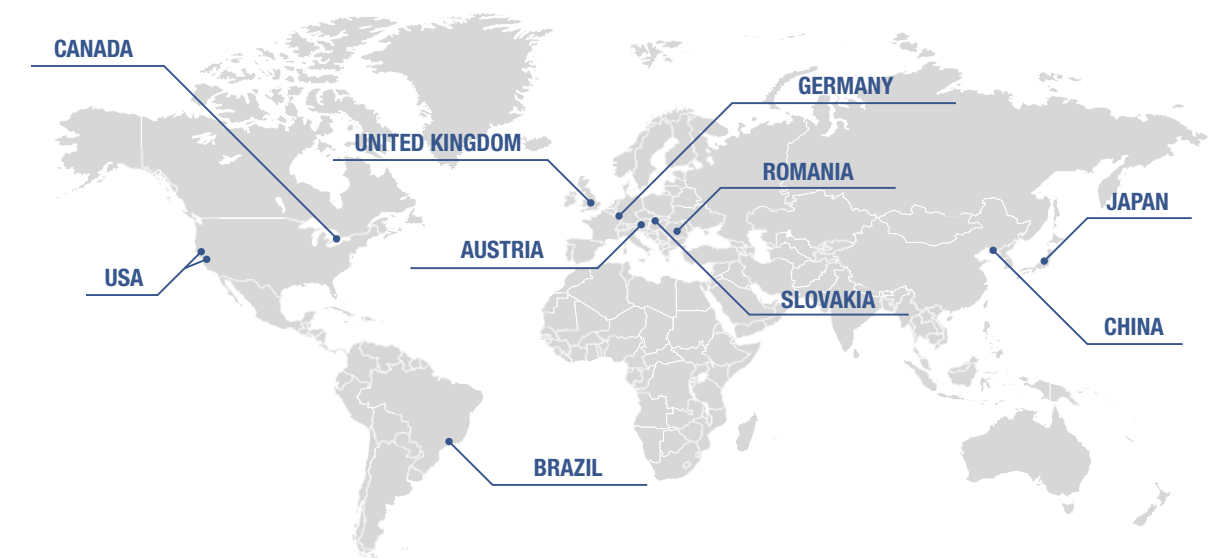
##### General information regarding the disclosed key figures and information

The key figures disclosed in this report have not been validated by any external body (with the exception of the auditor). The entire product development process – from the product idea, the design process, construction and development, collaboration with suppliers and the procurement of materials and production of drivetrain, chassis, and engine components, pumps, lightweight and composite brake discs, and aerospace components, through to packaging and shipping – is covered by an integ-

rated management system in accordance with ISO 9001:2015 and ISO 14001:2015 and controlled by the quality and process management system.

The scope of ISO 9001:2015 certification covers the Pankl Racing production sites in Austria, Germany, Slovakia, UK, China, and USA. At SHW, the scope of certification includes the sites in Germany, Romania, Canada, and China. At Pankl Racing, the ISO 14001:2015 certification covers not only the Austrian sites but also the production facilities in Slovakia, China, and USA. At SHW, the certification covers not only the German sites but also the production facilities in Brazil and Romania.

Further information on the requirements of BP-2 is presented together with the information to which it refers.





## GOVERNANCE

### GOV-1 – THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Pankl AG is a stock corporation under Austrian law. This legal form provides for a dual system, i.e., the separation of management (Management Board) and control (Supervisory Board) at the corporate level. As of 31 December 2024, the Management Board consisted of Wolfgang Plasser (CEO), Thomas Karazmann (CFO), Christoph Prattes (COO), Anton Hirschmann (COO), and Stefan Seidel (CTO); the Supervisory Board comprised five members. Neither body has any representation of employees or other workers. Co-operation between the Management Board and the Supervisory Board takes place at regular intervals and is based on open and transparent discussion.

The Management Board of Pankl AG is responsible for managing the company in accordance with the company's best interests, taking into account the interests of shareholders and employees, as well as the public interest. Management Board members are appointed by the Supervisory Board.

The Supervisory Board is responsible for monitoring the management of the company. For certain business transactions specified in the Austrian Stock Corporation Act (AktG), the Articles of Association, and the Rules of Procedure, the Management Board must obtain the approval of the Supervisory Board.

### COMPOSITION AND DIVERSITY

#### Management Board

Selection criteria for members of the Management Board are professional qualifications, leadership qualities and previous achievements as well as knowledge of Pankl AG companies and / or the special features of associated companies.

Age and gender are irrelevant in the decision regarding appointments to the Management Board and do not lead to any preferential treatment or discrimination in the selection process. As of 31 December 2024, the members of the Management Board were exclusively male (female share: 0%) and were born between 1962 and 1976.

#### Supervisory Board

The Supervisory Board is staffed with professionally and personally qualified individuals. Other aspects of Supervisory Board diversity are not taken into account. There are no women on the Supervisory Board.

Sustainability aspects are addressed within the Group both at the level of the core investments (Pankl Racing and SHW) and at the level of the parent company Pankl AG.



### CHANNELS FOR MANAGING SUSTAINABILITY ASPECTS

**Sustainability Steering Committee (SSC):** A Sustainability Steering Committee (SSC) was established at Pankl Racing in the 2024 fiscal year. Its responsibilities include managing and co-ordinating sustainability activities from a group perspective.

### GOV-2 – INFORMATION AND SUSTAINABILITY ASPECTS WHICH ARE ADDRESSED BY THE COMPANY'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Since Pankl AG's subsidiaries are each organized within a group structure, the Management Boards and Supervisory Boards of these companies are responsible for the design, implementation, and monitoring of sustainability commitments within their respective sub-groups. The consolidated impacts, risks, and opportunities reported for Pankl AG are therefore of minor or only selective significance with regard to the strategy as an investment holding company, which is why neither the Management Board nor the Supervisory Board addressed them in the 2024 fiscal year.

Sustainability management is largely carried out at the level of the Pankl Group subsidiaries. Both Pankl Racing and SHW each have a sustainability team that maintains regular co-ordination meetings, thus encompassing the sustainability management of Pankl Group. Both sustainability teams report to the Management Board at regular co-ordination meetings.

At these meetings, risks are explained in more detail to the Management Board, and appropriate measures are presented and subsequently approved by the Management Board. In addition, a quarterly co-ordination meeting for the environmental sector takes place, in which current topics are discussed in a condensed manner in collaboration with the specialist departments. Representatives of the affected and responsible departments as well as members of the Management Board participate. Due to the shareholder structure and the largely overlapping distribution of Management Board mandates both in the operating subsidiaries and at Pankl AG itself, reporting to the Supervisory Board takes place as part of the annual report preparation and the adoption of the annual financial statements.

### GOV-3 – CONSIDERATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SYSTEMS

The variable compensation of the Management Board takes into account only financial indicators (thus, no specific sustainability-related targets and / or impacts). The Supervisory Board considers these compensation arrangements appropriate for the Management Board of Pankl Group as an investment holding company.

Rather, the Supervisory Board assumes a holistic approach by the Management Board, in which

non-financial concerns are inherent to long-term, successful corporate management, ensuring the company's continued existence and the future viability of the business model.

Supervisory Board remuneration consists exclusively of an attendance fee for Supervisory Board meetings. To ensure impartial monitoring of management by the Supervisory Board, its members are not granted any variable remuneration.

## GOV-4 – STATEMENT ON DUE DILIGENCE

The following table shows the main steps of the due diligence procedures described in this non-financial statement.

Core elements of due diligence		Sections in the non-financial statement
a) Inclusion of due diligence in governance, strategy and business model	ESRS 2 GOV-2:	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model
	ESRS 2 GOV-2:	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	ESRS 2 SBM-2:	Interests and views of stakeholders
	ESRS 2 IRO-1:	Description of the process to identify and assess material impacts, risks and opportunities
	ESRS 2 MDR-P:	Policies adopted to manage material sustainability matters
b) Involvement of affected stakeholders in all important due diligence steps	ESRS S1-2:	Processes for engaging with own workers and workers' representatives about impacts
	ESRS S1-3:	Processes to remediate negative impacts and channels for own workers to raise concerns
	ESRS S2-2:	Processes for engaging with value chain workers about impacts
	ESRS S2-3:	Processes to remediate negative impacts and channels for value chain workers to raise concerns
	ESRS S4-2:	Processes for engaging with consumers and end-users about impacts
	ESRS S4-3:	Channels for consumers and end-users to raise concerns
	ESRS G1-1:	Business conduct policies and corporate culture for corporate management
	ESRS G1-3:	Prevention and detection of corruption and bribery
c) Identification and assessment of negative impacts	ESRS 2 SBM-3:	Material impacts, risks and opportunities and their interaction with strategy and business model
	ESRS 2 IRO-1:	Description of the process to identify and assess material impacts, risks and opportunities
	ESRS S2-4:	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers and, effectiveness of those actions
d) Measures to deal with negative impacts	"Management of impacts, risks and opportunities" – sections in the individual chapters on the topic-related standards	
e) Tracking the effectiveness of these efforts and communication	„Key figures and objectives“ – sections in the individual chapters on the topic-related standards	

## GOV-5 – RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

A complete integration of analyses of the impact of climate change on the strategy and business model of Pankl Group is not yet possible.

Risk management is currently carried out in the respective specialist departments. A comprehensive risk analysis, including the integration of climate risks, is planned for the 2025 fiscal year. The goal is to integrate and deepen the findings gained in the course of preparing the sustainability statement into a holistic risk management system across the Group. For example, the additional climate risk and vulnerability analysis for Pankl Group's production sites will be considered a component of risk management in the future. It is planned to integrate this analysis with financial reporting.

A sustainability team has been established in each of Pankl Group's operating subsidiaries. These teams work in close collaboration to report to Pankl Group's sustainability management and thus ensure the control function. Due to the large number of departments involved in the preparation of the non-financial statement, bundling competencies and responsibilities within sustainability management is important to support the departments and ensure correct data consolidation. Data collection is carried out group-

wide using a central software solution, which ensures the traceability and validation of the submitted raw data via an integrated audit trail.

Data reporting is carried out by defined departments, which also store corresponding supporting documents in the system. Based on this information and the audit trail, a content review is carried out by Sustainability Management. After successful plausibility check and approval, the data is consolidated in the system. IT risks that could arise from the use of the software solution are addressed through technical and organizational measures – in particular, through controlled authorization with limited access and modification rights, as well as the regular creation of backup copies. The sustainability team reports regularly to Sustainability Management on a monthly basis, which subsequently reports regularly to the SSC. To ensure the ongoing involvement of the relevant departments in the process, a quarterly co-ordination meeting for the environmental department is held, attended by the Pankl Group Management Board. The review and approval of the entire non-financial statement is carried out by Pankl Racing's Sustainability Management, ensuring the plausibility and validity of the data.

## STRATEGY

The strategic decisions and measures are made and controlled at the subsidiary level.

## SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Pankl Group's main product groups include both high-precision individual components and complete systems for the automotive and aerospace industries. Development and production are carried out for the racing, luxury automobile, passenger car, aerospace, truck & off-highway, two-wheeler, and industrial markets. There have been no changes to the main product groups, or the markets served.

Component manufacturing sites are located in Austria, Germany, Slovakia, Romania, United Kingdom, North America, China, and Brazil. As of 31 December 2024, Pankl Group employed 4,154 people, of which 3,530 were in Europe. The exact distribution of employees by country is shown in Section S1-7.



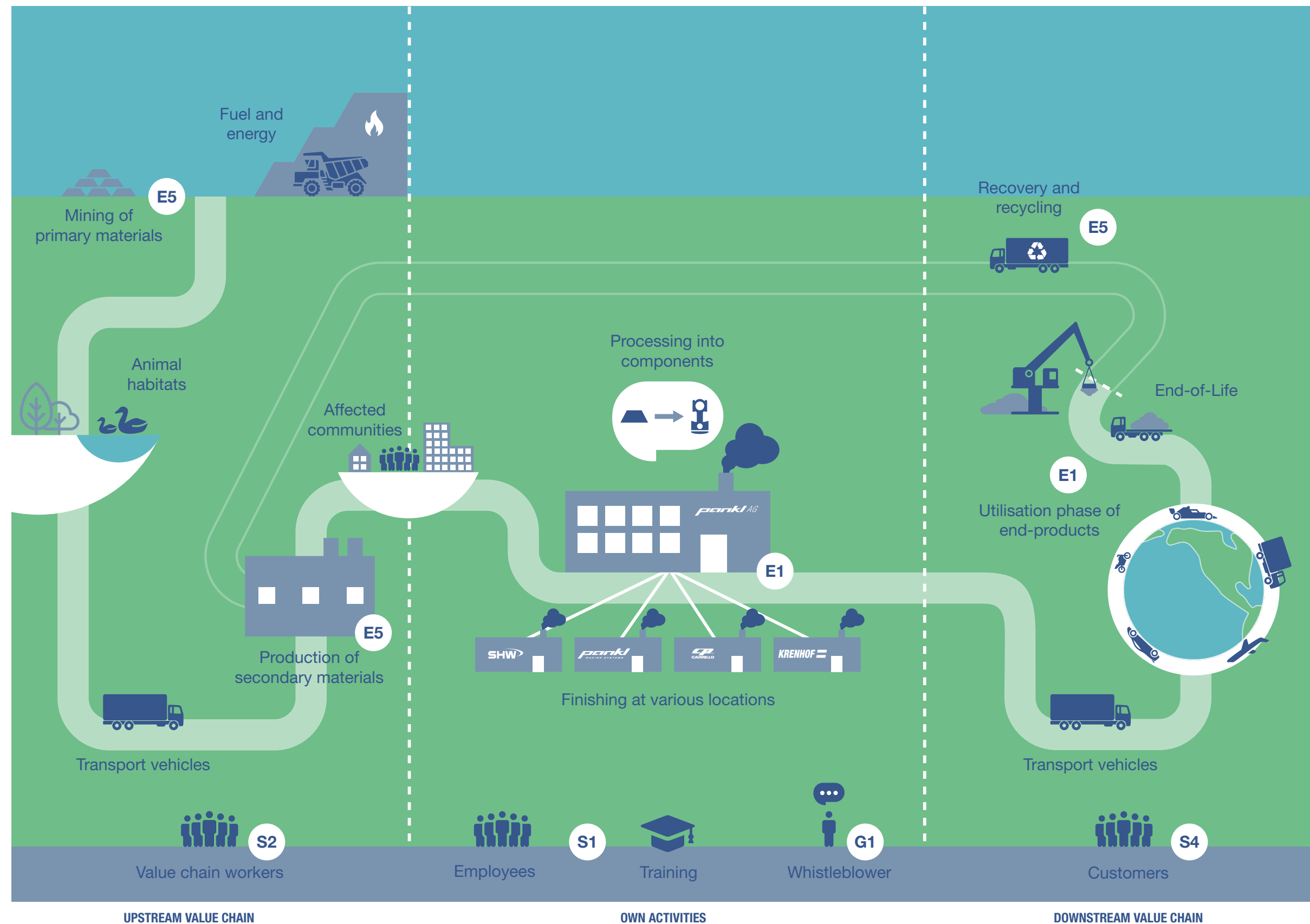
## VALUE CHAIN

The value chains of the subsidiaries are globally structured and widely branched. Key input parameters include raw materials, materials, and semi-finished parts for the manufacture and assembly of drivetrain components within Pankl Group. The purchased goods are largely made of aluminum, steel, and titanium. Reusable racks, cardboard boxes, and wire mesh crates are often used for packaging and shipping. Further information on material flows can be found in Section E5-4. Due to the complexity of the upstream value chains, it is difficult to trace the purchased goods back to their origin. However, key process steps in the upstream value chain are the extraction of raw materials and their processing into primary and secondary products, as well as transport and storage processes. Furthermore, the reprocessing of end-of-life products and their return to the cycle are part of the upstream and downstream value chains of the products.

A large portion of the purchasing volume at the Austrian locations comes from Europe (over 80%). As a Tier 1 supplier, Pankl Group works closely with its long-standing partners. The subsidiaries offer their customers, investors, and stakeholders benefits in the following areas:

- Manufacture and distribution of drivetrain, engine, and chassis components, brake discs, and aerospace components
- Workplaces with high safety standards
- Employee benefits

Pankl Group's largest sales markets are located in Europe and North America. No significant changes in these sales markets were observed in the 2024 fiscal year. After the end of the product life cycle, it is assumed that it will be dismantled or metal recycled. Individual raw materials, such as metals, can then be returned to the material cycle.



SUSTAINABILITY POSITIONING

In the 2024 fiscal year, Pankl Group developed a decarbonization strategy that incorporates the upstream and downstream value chain. This strategy will be further developed and specified in the 2025 fiscal year. This strategy will encompass the company's global locations and greenhouse gas emissions across all three scopes of the Greenhouse Gas Protocol (GHG Protocol). Due to the complex, partly multi-stage, globally ramified upstream and downstream value chain, far-reaching impacts on business activities can be expected from a geographical perspective.

The decarbonization strategy is described in E1-1. Measures to reduce emissions have already been implemented in the past. For example, various energy efficiency measures were implemented at the production sites. These measures are described in more detail in E1-3. Further sustainability risks and opportunities are addressed in the SBM-3 sections of the topic-related standards.

SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

Due to the presence of products from the various business divisions, Pankl Group has diverse stakeholder groups on the global market, whose interests and views are taken into account as balanced as possible. The Group always strives to maintain a continuous dialogue with its stakeholders.

The sustainability-related results of the stakeholder dialogue are incorporated into the Group's business processes and the double materiality analysis, as well as discussed in coordination meetings described in GOV-1 and GOV-2.

The findings from stakeholder engagement impact management decisions and play a relevant role in its actions. These insights lead to measures such as the long-term preservation of jobs, which underscore the Group's role and reputation as an attractive and one of the largest employers in the various regions; the Group's efforts and initial steps towards developing a decarbonization strategy; and the correct and transparent governance of business relationships in the global markets in which the Group operates.

In its Code of Conduct (see G1-1), Pankl Group sets out principles for fair, trusting, and respectful co-operation and for the observance of human rights for itself and its business partners. The scope of the Code of Conduct therefore also includes the upstream and downstream value chain and is intended to contribute to the protection of workers in the value chain. These workers were not explicitly included. The interests and viewpoints of workers in the value chain are indirectly considered through the Value Chain Risk Analysis. Furthermore, they can report their concerns via the respective whistleblower system or the Group's Compliance Reporting Office. Further information on workers in the value chain can be found in section ESRS S2.

Major stakeholders	Inclusion	Purpose	Results
Employees and their representatives	Employee interviews, training, staff meetings, employee representatives, information events, written and verbal business correspondence, intranet	The Group values the interests of its employees and strives to implement them within the framework of economic efficiency. Compliance with human and labor rights is always a top priority and is considered in all processes.	Through this involvement, employees and their representatives have the opportunity to learn about current developments and contribute their knowledge. Representatives of employee representatives are always involved in far-reaching decisions to ensure the best possible consideration of employee interests.
Suppliers	Trade fairs, online tools, written and verbal business correspondence, supplier visits	Suppliers form a key pillar of the Group's daily business. Regular communication supports them and ensures that the Group's requirements are implemented. Suppliers also form the interface to the upstream value chain.	Through dialogue with suppliers, long-term business relationships can be established. Where possible, a local procurement strategy is pursued.
Customers	Trade fairs, product presentations, written and verbal business correspondence, customer visits	Customers represent another important pillar of our daily business. Regular communication ensures that requirements are implemented. Suppliers also form the interface to the downstream value chain. Their interests flow into product and quality management, among other things, and thus into the business models of the other sub-groups.	Through dialogue with customers, long-term business relationships can be built. These are particularly crucial in the design process.
Politics, networks and associations	Company representatives in networks and associations	The group is represented in various networks and associations to ensure the exchange of experience with other companies and organizations. The goal is to promote mutual exchange of know-how and the utilization of synergies.	Management Board representation in the management advisory board of the DELTA Academy of the Montanuniversität, Tourism Association of Upper Styria and AC Styria. Management Board representation in the Industry Federation and Austrian Society for Metallurgy and Materials (ASMET).
Municipalities, cities and public administration	Permits, construction work, written and oral business correspondence	Co-operation with municipalities and cities is important due to the approval processes of various projects.	Projects are discussed early on in regular meetings to incorporate any necessary adjustments into the planning process. Co-ordination sessions are also useful for ensuring the necessary infrastructure for the company and its employees.

ESG ratings

ESG ratings are used to assess the sustainability performance of companies or institutions by considering their exposure to ESG risks and their impacts on social and ecological environments. The scores in the table below show how subsidiaries are rated for their sustainability performance by various ESG rating agencies (the assessment was based on data from the 2023 fiscal year).

Ratings	Division	Score	Update
EcoVadis	Pankl Racing Systems AG	55	13 January 2025
CDP	Pankl Racing Systems AG	B	5 February 2025
EcoVadis	Pankl Aerospace Systems Europe GmbH	61	20 August 2024
EcoVadis	SHW AG	48	13 January 2025
CDP	SHW AG	D	5 February 2025

SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

As part of the double-materiality analysis, 24 IROs were identified as material. They are described and reported in more detail in this non-financial statement. For ease of readability, the IROs are presented in more detail in the respective ESRS chapters.

The identified IROs are largely covered by the ESRS disclosure requirements. These company-specific disclosures have been specifically identified in the chapters on the topic-related standards. No IROs were identified that were presented exclusively using company-specific disclosures.



The following IROs were assessed as material in the double materiality analysis:

ESRS	Topic	IRO	Major impacts, risks or opportunities	Affects primarily		Handling
				Business model & corporate strategy (OO)	Up- and downstream value chain (VC)	
E1 Climate change	Climate change mitigation	01	Greenhouse gas emissions (scope 1 and 2)	✓		Establishment of climate protection measures
		02	Greenhouse gas emissions (scope 3)		✓	
		03	New regulations in the area of sustainability with a focus on combating climate change	✓		
	Climate change adaptation	04	Transitional risks due to the development towards a low-carbon society, such as declining acceptance of combustion engines	✓	✓	
	Energy	05	Consumption of non-renewable energy in production	✓		Multiple sourcing & promotion of independence
		06	Generation and use of renewable energies at various locations	✓		
		07	Dependence on reliable energy supply for production and assembly activities	✓		
E5 Use of resources and circular economy	Resource inflows	08	Consumption of primary and secondary materials in production processes		✓	
		09	Risk of supply chain delays and limited material availability	✓	✓	
	Resource outflows	10	Long-term tying up of resources in products and no fully closed resource cycle	✓	✓	Promotion of circular economy
		11	Resource outflows related to products and services, reusability, metals life cycle		✓	
		12	Waste generation (non-hazardous and hazardous) from production processes	✓	✓	



ESRS	Topic	IRO	Major impacts, risks or opportunities	Affects primarily		Handling
				Business model & corporate strategy (OO)	Up- and downstream value chain (VC)	
S1 Own workforce	Secure employment	13	Restructuring can lead to uncertainty, dismissals and dissatisfaction	✓		Improving-working conditions
	Occupational safety and health protection	14	Occurrence of (serious) work accidents in production	✓		
	Training and skills development	15	Securing future prospects and skills development of employees through further training opportunities	✓		
	Equal treatment and equal opportunities	16	Intercultural co-operation and individual development	✓		
		17	Gender inequalities in pay and leadership positions	✓		
	Data protection	18	Risk of data loss or data misuse	✓		Data security and protection
		19	Violation of data protection regulations and resulting fines	✓		
S2 Value chain workers	Working conditions	20	Potentially poor working conditions in certain sectors of the upstream value chain		✓	Contractual terms and conditions with direct business partners and minimum requirements regarding ESG performance, particularly for suppliers
	Work-related rights	21	Potential occurrence of forced labor and child labor in certain sectors of the upstream value chain		✓	

ESRS	Topic	IRO	Major impacts, risks or opportunities	Affects primarily		Handling
				Business model & corporate strategy (OO)	Up- and downstream value chain (VC)	
G1 Business conduct	Corporate culture	22	Promoting a responsible corporate culture	✓	✓	Awareness raising, transparency
	Protection of whistleblowers	23	Strengthening trust and a sense of security by protecting whistleblowers	✓	✓	
	Corruption and bribery	24	Risk of financial loss due to corruption and bribery cases	✓	✓	

Further information on the handling of the material IROs at the administrative and management body level can be found in sections GOV-1 and GOV-2. To date, no material changes to the business model have been implemented due to the IROs. The impact of material risks and opportunities on the business model of the subsidiaries is assessed by the risk management (of the specialist departments) of the respective subsidiary in the course of scenario analyses (e.g., climate risk and vulnerability analysis).

The analyses focused on the short-term time horizon. The respective impact on the business model of the individual risks and opportunities, as well as how these are dealt with and the material impacts, are presented in the descriptions of these in the chapters on the topic-related standards. For information on the general corporate strategy and resilience, please refer to sections BP-2 SBM-1.



CHANGES TO THE NON-FINANCIAL STATEMENT

In the 2024 fiscal year, Pankl Group prepared a non-financial statement in accordance with the requirements of the European Sustainability Reporting Standards (ESRS) for the first time. The 2023 materiality analysis was already based on the process for identifying material impacts, risks, and opportunities (IROs) specified in the ESRS. This process was fully implemented in the 2024 fiscal year.

The most significant novelty was the more detailed identification of relevant content at the IRO level, instead of the previously aggregated analysis of key topic areas.

Due to this change in approach, a direct comparison of the analyses and their results with the previous year is only possible to a limited extent.

The materiality analysis will be reviewed annually for relevance and adjusted as needed. Comprehensive stakeholder engagement - for example, through focus interviews - to validate and further develop the IRO survey is planned for the fiscal year 2027. This cycle can be shortened if necessary.



MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

The management of impacts, risks and opportunities takes place at the subsidiary level.

IRO-1 – DESCRIPTION OF THE PROCESS FOR IDENTIFYING AND ASSESSING SIGNIFICANT IMPACTS, RISKS AND OPPORTUNITIES

Major topics

To identify the material topics, a double materiality analysis was conducted in 2024. It was divided into the inside-out and outside-in perspectives.

The inside-out perspective examines Pankl Group's impact on its environment and was based on an impact assessment by Sustainability Management. The outside-in perspective describes the influence of sustainability issues on Pankl Group. The focus here was on financial risks and opportunities, taking into account interdependencies, identified and evaluated

by Sustainability Management.

This assessment process is expected to be integrated into the risk management process in the 2025 fiscal year

1. Context analysis of the sub-groups
2. Identification of IROs along the value chains and business units
3. Evaluation of the identified IROs over various time horizons

Context analysis

As part of the context analysis, the upstream and downstream value chains, as well as the Group's own activities and locations, were evaluated as best as possible for potential IROs. Peer groups and the requirements of sector-specific sustainability reporting standards were also analyzed. Stakeholders (e.g., employees, customers, suppliers) were engaged through questionnaires, focus interviews, and expert discussions.

The identification of IROs was based on the ESRS 1 AR 16 long list. The topics were supplemented with the findings of the context analysis. Furthermore, publicly available studies and analyses were used to identify IROs and evaluate them in a subsequent analysis step. This step concluded with an initial selection of topics and IROs related to the sub-groups.

Evaluation of IROs

Next, the materiality of each IRO was assessed. The impacts were assessed based on the criteria of magnitude, extent, reversibility, and probability, each on a five-point scale defined using qualitative and quantitative metrics. In the case of positive IROs, the reversibility criterion was omitted without replacement. For actual impacts or impacts related to human rights, a probability of 100% was assumed.

After consolidating these assessments, Pankl Group's sustainability management evaluated the risks and opportunities using appropriate methods (e.g., 3F, Delphi method). Both the impacts and the risks and opportunities were assessed specifically for the respective applicable time horizons. The period with the highest rating was decisive for the subsequent categorization into material and non-material IROs based on a materiality threshold. For categorization as material, it was sufficient if the issue exceeded the materiality threshold from either the inside-out or outside-in perspective. The internal controls described in GOV-5 were also applied for the double materiality analysis.

The risks and opportunities were assessed in terms of their extent and probability – also on five-level scales – and considered both the implications of the material impacts and dependency situations. Assessments provided by the risk management of the specialist departments to Pankl Group's sustainability management were also used.

	Criteria	Underlying questions
Impacts	Scale	How much does the impact affect the environment, involved individuals, or society, taking into account existing measures? Planned measures were not considered.
	Scope	What is the impact in terms of geographical scale or number of people affected?
	Reversibility	How easily can the original condition be restored?
Risks and opportunities	Scale	How large and serious is the risk or opportunity, taking into account existing measures?
Impacts, risks and opportunities	Probability	How likely is the impact, risk or opportunity to occur within a specified period of time?



## ADDITIONS DUE TO THE TOPIC-RELATED REQUIREMENTS FOR THE MATERIALITY ANALYSIS

### E1- Climate change

As a manufacturer of drivetrain, engine, and chassis components, brake discs, and aerospace components installed in motor vehicles and aircraft, Pankl Group contributes to climate change through its greenhouse gas emissions. A large portion of GHG emissions arise in the upstream value chain - specifically, through the purchase of raw materials for component manufacturing (Scope 3.01 of the GHG Protocol). When assessing the materiality of GHG emissions, the greenhouse gas balance of previous years was taken into account, thus enabling primary emission drivers to be identified. Further information on the current GHG balance can be found in Section E1-6. Furthermore, external factors such as social and regulatory changes were considered. The determination of climate-related physical risks was based on the site-level climate risk and vulnerability analysis conducted in the 2024 fiscal year. A special software solution was used to analyze the physical climate-related impacts on the company (chronic and acute). The Group's production-relevant sites were examined for their current and future exposure to physical climate risks. The periods up to 2030 and 2060, as well as the climate scenarios SSP1-2.6, SSP2-4.5, and SSP5-8.5, were considered. The time horizons and climate scenarios were selected based on external factors, such as binding requirements in regulations or contracts. They also allow a broader view of potential risks, as marginal positions are considered.

The climate scenarios are defined as follows:

- **SSP1-2.6:** Achieving net-zero emissions by 2070
- **SSP2-4.5:** No change in CO<sub>2</sub> emissions by mid-century compared to current emission intensity
- **SSP5-8.5:** Doubling of CO<sub>2</sub> emissions by 2050

The analysis evaluated potential exposure and existing mitigation measures. Impacts and mitigation measures were assigned to all identified physical climate risks. The mitigation measures significantly reduce the impacts of climate risks, so no further action is required for the time being.

As stated in GOV-5, Pankl Group plans full implementation into risk management in the 2025 fiscal year. Nevertheless, climate-related transition risks and opportunities were assessed both as part of climate risk and the vulnerability analysis and during the development of the decarbonization strategy. Initial results of this can be found in E1-1.

### E2 – Pollution

Was assessed as immaterial based on the materiality analysis.

### E3 – Water and marine resources

Was assessed as immaterial based on the materiality analysis.

### E4 – Biologische Vielfalt und Ökosysteme

Was assessed as immaterial based on the materiality analysis.

### E5 – Resource use and circular economy

To identify significant IROs related to resource use and the circular economy, Pankl Group examined its various business activities and resource inflows and outflows in the previous year. Inflows to metal casting and raw material inflows were identified as relevant for resource inflows. The components are also relevant for resource outflows and the circular economy. In the 2024 fiscal year, the sub-groups procured various raw materials, including steel, aluminum, and titanium. An analysis of the materials used by weight can be found in Section E5-4. Local communities were not consulted.

### G1 – Business conduct

Within Pankl Group, there are no significant or relevant differences in corporate governance between the individual companies, locations, or business activities of the respective subsidiaries. Therefore, when determining the material impacts, risks, and opportunities (IROs) related to governance issues, we deliberately refrained from differentiating by location, activity, sector, or structure of the transaction. Instead, the assessment of potential governance-related IROs is carried out holistically by the respective legal department of the sub-groups, which takes an overarching perspective and defines the relevant issues centrally.

## IRO-2 – DISCLOSURE REQUIREMENTS CONTAINED IN ESRS AND COVERED BY THE COMPANY'S SUSTAINABILITY STATEMENT

To ensure comprehensive reporting, the ESRS data points were mapped to the material IROs. Data points that could not be assigned to material IROs were analyzed for their relevance to the Group and its stakeholders and, where appropriate, also reported.

An overview of the disclosure requirements addressed in this non-financial statement can be found on page 96. Furthermore, the non-financial statement contains information required by other EU legislation.





# EU-TAXONOMY

## INFORMATION PURSUANT TO ARTICLE 8 OF EU REGULATION 2020/852 (TAXONOMY REGULATION)

Within the framework of the EU Action Plan on Sustainable Finance, redirecting capital flows into sustainable investments is a key objective. Against this backdrop, the EU Taxonomy Regulation (Taxonomy Regulation, EU Regulation 2020/852) entered into force in mid-2020. It provides a uniform and legally binding classification system that defines which economic activities in the EU are considered environmentally sustainable. In addition, the European Commission has issued various delegated regulations, in particular the EU Disclosures Delegated Act 2021/2178, the EU Environmental Delegated Act 2023/2486 (environmental objectives 3 to 6), and the EU Climate Delegated Act 2021/2139 in conjunction with EU Regulation 2023/2485 (environmental objectives 1 to 2).

The EU Taxonomy contains six environmental objectives:

1. Climate change mitigation;
2. Climate change adaptation;
3. Sustainable use and protection of water and marine resources;
4. Transition to a circular economy;
5. Pollution prevention and control;
6. Protection and restoration of biodiversity and ecosystems.

When classifying economic activities, a distinction is made between taxonomy eligibility and taxonomy compliance. An economic activity is taxonomy eligible if it is included in the Taxonomy Regulation catalogue and can therefore potentially contribute to the achievement of one or more environmental objectives. Taxonomy compliance requires the cumulative assessment and fulfillment of the following three conditions:

- The economic activity makes a significant contribution to at least one of the six environmental objectives.
- It does not cause significant harm to the other (one or more) environmental objectives – "Do No Significant Harm" (DNSH).
- Minimum standards regarding social and governance criteria are met – minimum protection.

The results of the classification must be reported annually for each company. Defined key figures relating to revenue, capital expenditure (CapEx), and operating expenditure (OpEx) must be disclosed. Since the requirements for sustainable economic activities for the respective environmental objectives of the Taxonomy Regulation were published successively, reporting simplifications applied in previous fiscal years. For the 2024 fiscal year, reporting on taxonomy eligibility and compliance for all six environmental objectives will be complete for the first time.

## REPORTING FOR THE FISCAL YEAR 2024

For the 2024 fiscal year, all environmental targets were reviewed for taxonomy compliance for the first time. Due to investments, for example, in the areas of building energy efficiency, new, non-revenue-related economic activities were also identified (e.g., CCM 7.5. "Installation, maintenance, and repair of equipment for measuring, regulating, and controlling the energy performance of buildings").

Furthermore, company bicycles reported under operating expenses (after full proof of compliance) were

reported as taxonomy-compliant for the first time. They fall under the economic activity CCM 6.4. "Operation of personal mobility devices, bicycle logistics."

The requirements of the Taxonomy Regulation were primarily addressed by the ESG Management department and the Controlling, Accounting, and Investor Relations departments. Other departments were involved as needed (e.g., Real Estate Management, Quality Management, and the Legal Department).

The determination of taxonomy eligibility and compliance was carried out in the following process steps:

1. Determination of the companies to be included
2. Analysis of revenue-related economic activities
3. Analysis of non-revenue-related economic activities
4. Classification of activities as economic activities (taxonomy eligibility)
5. Fulfillment of the technical assessment criteria for a significant contribution
6. Provision of evidence of the DNSH criterion
7. Compliance with the minimum social protection criteria
8. Calculation of the taxonomy indicators
9. Consolidation
10. Reporting, including reporting templates

Regulatory developments and clarifications regarding interpretation by the EU may require adjustments and corresponding explanations in future reporting under the Taxonomy Regulation. In the event of any changes in the valuation methodology, the comparative figures for the previous period will also be recalculated for the sake of comparability.

## ECONOMIC ACTIVITIES

The analysis of economic activities was differentiated according to sales-related and non-sales-related areas:

- Sales-related economic activities generate revenue for the company and include the entire product portfolio and the associated investments and costs.
- Non-sales-related economic activities refer to investments and costs that are not related to the business model and revenues, but are incurred as part of the business activity.

As part of the taxonomy assessment, the following economic activities were examined for Pankl Group:

### Sales-related economic activities

One of Pankl Group's business areas encompasses the development, production, and distribution of components for motor vehicles. Only those components that demonstrably contribute to improving environmental performance and are used exclusively in zero-emission vehicles were assigned to the environmental objective "Climate Change Mitigation" and the economic activity CCM 3.18 "Manufacture of Automotive and Mobility Components." All other components from this area were classified as non-taxonomy-eligible.

In addition, Pankl Group is active in the development, manufacture, and distribution of propulsion systems and components for the aerospace industry. These activities have been assigned to the environmental objective "Climate Change Mitigation" (as well as to the economic activity CCM 3.21 "Manufacture of Aircraft") and classified as eligible for taxonomy.

Products that could not be directly assigned to an economic activity were classified as non-taxonomy-eligible.

For the 2024 fiscal year, the following key sales-related economic activities were analyzed in connection with the Taxonomy Regulation:

Code	Economic activity	Description
CCM 3.18.	Manufacture of automotive and mobility components	Development, production and distribution of components for motor vehicles
CCM 3.21.	Manufacture of aircraft	Development, production and distribution of propulsion systems and components for aircraft and power units

Non-sales related economic activities

The analysis of non-sales-related economic activities was initially based on discussions with the relevant departments. Further analysis examined the clear allocation of costs to the respective economic activity to eliminate double counting in the calculation.

For the 2024 fiscal year, the following significant non-sales-related economic activities were analyzed in connection with the Taxonomy Regulation:

Code	Economic activity	Description
CCM 6.4	Operation of personal mobility or transport devices, bicycle transport logistics	Company bikes (bicycle leasing)
CCM 6.5.	Transport by motorbikes, passenger cars and light commercial vehicles	Company cars
CCM 7.3.	Installation, maintenance and repair of energy efficiency equipment	Conversion to LED lighting
CCM 7.4.	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking places attached to buildings	E-Ladeinfrastruktur für Dienstfahrzeuge
CCM 7.5.2)	Installation, maintenance and repair of devices for measuring, regulating and controlling the overall energy efficiency of buildings	Smart meters, energy management, computer-aided facility management (CAFM)
CCM 7.6.	Installation, maintenance and repair of renewable energy technologies	Photovoltaic systems, energy ring to increase the self-generated electricity quota from photovoltaic systems
CCM 7.7.	Acquisition and ownership of buildings	Purchase, rent and leasing of buildings

COMPLIANCE REQUIREMENTS

For the economic activity CCM 3.18 "Manufacture of automotive and mobility components," it was already ensured during the taxonomy eligibility assessment that the corresponding components are used exclusively in zero-emission vehicles. These components therefore meet the technical assessment criteria for a significant contribution to the environmental objective of "Climate Change Mitigation."

For the economic activity CCM 3.21 "Manufacture of aircraft," a review was conducted to determine whether the target vehicles in question met the technical assessment criteria for the environmental objective "Climate Change Mitigation." This review revealed that the criteria were not met.

The non-sales-related economic activities assigned to the environmental objective "Climate Change Mitigation" largely meet the relevant technical assessment criteria. Exceptions are the company vehicles and trucks in the vehicle fleet (CCM 6.5 "Transportation by motorcycles, passenger cars, and light commercial vehicles") and all activities within the economic activity CCM 7.7 "Acquisition and ownership of buildings." For these activities, no taxonomy-compliant share could be reported because either the required evidence was missing or the requirements for a significant contribution to the environmental objective were not met.

Do No Significant Harm (DNSH)

The DNSH criterion was assessed for all economic activities that met the technical assessment criteria for a significant contribution to an environmental objective.

To avoid significant impacts on the environmental objective of "Climate Change Adaptation" climate risk and vulnerability analyses were conducted for the Pankl Group's sites. The aim was to assess the physical impacts of climate change on the sites relevant to economic activities.

The analysis first identified potential climate impacts on economic activities. Current and future climate risks were then assessed based on climate projections. Based on this, the identified risks were assigned to the affected economic activities and appropriate mitigating measures were defined. Further details can be found in section IRO-1.

To rule out potential impacts on other environmental objectives, the respective requirements of the "Do No Significant Harm" (DNSH) principle were analyzed. If an economic activity does not require proof or does not fall within the scope of the respective criteria, the requirements are considered to be met.

The DNSH criterion assessment showed that the activities from the following economic activities met the requirements of the Taxonomy Regulation and no other environmental objective was significantly negatively affected.

- CCM 6.4. „Operation of personal mobility or transport devices, bicycle transport logistics“
- CCM 7.3. „Installation, maintenance and repair of energy efficiency equipment“
- CCM 7.4. „Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking places attached to buildings“
- CCM 7.5. „Installation, maintenance and repair of devices for measuring, regulating and controlling the overall energy efficiency of buildings“
- CCM 7.6. „Installation, maintenance and repair of renewable energy technologies“

Minimum protection

Finally, it must be ensured that all business activities are in compliance with the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the ILO Core Labor Standards, and the International Bill of Human Rights. These requirements are met by the company-wide Code of Conduct, which defines the principles for responsible business conduct and forms the basis of all cooperation within the group and with external partners.

As part of its corporate due diligence, Pankl Group actively addresses relevant risks. These include, in particular, human rights issues – such as protection from child and forced labor, as well as the protection of labor and consumer rights – as well as risks related to corruption, taxation, and fair competition. These measures apply across all locations and along the entire supply chain, with the goal of identifying potential negative impacts at an early stage and addressing them specifically. Further information on the implementation of due diligence can be found in section GOV-4.

## CALCULATION OF KEY RATIOS

All fully consolidated companies were included in the calculation of the key figures according to the Taxonomy Regulation. Double counting was avoided, as the allocation to an economic activity was made either directly or based on an appropriate breakdown. The reported values for the 2023 fiscal year correspond to the retroactively adjusted results, which were recalculated based on the amended valuation methodology for the economic activity CCM 3.18 "Manufacture of automotive and mobility components."

### Sales key figure

The sales ratio is calculated as the ratio of sales revenue from taxonomy-eligible or taxonomy-compliant economic activities in a fiscal year to total sales revenue for the fiscal year. The amounts reported under this item in the consolidated income statement represent the basis for sales revenue (denominator).

According to the Taxonomy Regulation, the total revenue for the 2024 fiscal year of €890m (2023: €936m) forms the denominator of the group's revenue indicator. A detailed analysis of the revenue was used to allocate the respective revenue to the taxonomy-eligible economic activities. The respective allocated share forms the numerator of the revenue of the taxonomy-eligible economic activities for the 2024 fiscal year.

Revenue from the manufacture of components that improve the environmental performance of zero-emission vehicles was allocated to the economic activity CCM 3.18. "Manufacture of automotive and mobility components" and classified as taxonomy-eligible. The adjusted valuation methodology for the economic activity CCM 3.18. "Manufacture of

automotive and mobility components" significantly influences the amount of taxonomy-eligible revenue.

All revenue from the manufacture of aircraft components was allocated to the economic activity CCM 3.21. "Manufacture of aircraft" and reported as taxonomy-eligible. All other economic activities that could not be allocated to any economic activity listed in the Taxonomy Regulation and were therefore assessed as non-taxonomy-eligible were not taken into account in the calculation of taxonomy-eligible revenues. Taxonomy compliance for the economic activities CCM 3.18. "Manufacture of automotive and mobility components" and CCM "3.21. Manufacture of aircraft" could not subsequently be determined because the compliance conditions were not fully met.

Compared to the previous year, there was a decline in revenue of approximately 4.9% in the 2024 fiscal year. This impacted the amount of taxonomy-eligible revenue, but had no significant impact on the share of taxonomy-eligible revenue in Pankl AG's total revenue (2024: 8.9%, 2023: 5.1%).

### CapEx key figure

Taxonomy-eligible or taxonomy-compliant CapEx indicates the share of capital expenditure (CapEx) that is associated either with taxonomy-eligible or taxonomy-compliant economic activities or with the acquisition of products and services from taxonomy-eligible or taxonomy-compliant economic activities.

According to the Taxonomy Regulation, the capital expenditure base (denominator) includes additions

to property, plant and equipment and intangible assets before depreciation and any revaluations and excluding changes in fair value. The denominator also includes additions to property, plant and equipment and intangible assets resulting from business combinations (application of IFRS [IAS 16, 38, 40, 41, IFRS 16] or national accounting policies if IFRS are not applied). Additions to goodwill are not included in the calculation.

Capital expenditure [€m]	2024	2023
IAS 16 Fixed assets	47,915	34,634
IAS 38 Intangible assets	5,966	6,521
IFRS 16 Leasing	15,723	17,113
<b>Total</b>	<b>69,605</b>	<b>58,268</b>

The denominator of the Group's CapEx figure for the 2024 fiscal year is therefore the additions to tangible and intangible assets, as well as the additions from capitalized right-of-use assets of €58m (2023: €69m). Not included are additions from advance payments for property, plant and equipment and intangible assets of €38m.

However, transfers from property, plant and equipment and intangible assets amounting to €15m and €0.1m respectively were taken into account in the calculation.

To calculate the numerator, a detailed analysis of the denominator's investment expenditure was conducted. The first step involved determining taxonomy eligibility by allocating investment expenditure to economic activities. In the second step, taxonomy-eligible investment expenditure was reviewed for taxonomy compliance. The numerator includes investment expenditure for economic activities that are either linked to a taxonomy-eligible or taxonomy-compliant economic activity or represent the acquisition of products and services from a taxonomy-eligible or taxonomy-compliant economic activity. Investments that could not be allocated to any economic activity (e.g., undeveloped land and daycare centers) were reported as non-taxonomy-eligible.

Investments related to the economic activities CCM 3.18. "Manufacture of automotive and mobility components" and CCM 3.21. "Manufacture of aircraft" include all activities related to the respective revenue-generating activity. These include, for example, production facilities, operating and business equipment, capitalized research and development costs, and tools.

All other investments that were directly allocated to a non-taxonomy-eligible sales-related activity were classified as non-taxonomy-eligible. As in the previous year, investments related to bicycles were identified as taxonomy-eligible, since in-house production would allow them to be reported as taxonomy-eligible revenue. Due to incomplete fulfillment of the compliance conditions, no taxonomy-compliant portions could be reported for the investment expenditure related to the economic activities CCM 3.18. "Manufacture of automotive and mobility components" and CCM 3.21. "Manufacture of aircraft."

Likewise, investments in the areas of transport by motor vehicle (economic activities CCM 6.5. "Transport by motorcycles, passenger cars, and light commercial vehicles") and CCM 7.7. "Acquisition and ownership of buildings" could not be demonstrated to be taxonomy compliant because the compliance conditions were not fully met.

All activities from the following economic activities make a significant contribution to the environmental objective of "Climate Change Mitigation" and have been certified as taxonomy-compliant following successful compliance testing:

- Investment expenditures for photovoltaic systems and in connection with the construction of a group-owned energy ring to increase the company's own share of electricity generation from photovoltaic systems were allocated to the economic activity CCM 7.6. "Installation, maintenance, and repair of renewable energy technologies."
- Investments in systems for more efficient energy use in buildings were allocated to the economic activity CCM 7.5. "Installation, maintenance, and repair of equipment for measuring, regulating, and controlling the overall energy efficiency of buildings."
- The installation of electric vehicle charging stations and the directly related costs (e.g., excavation work) were allocated to the economic activity CCM 7.4. "Installation, maintenance, and repair of electric vehicle charging stations in buildings (and in parking lots belonging to buildings)."
- Investments for the conversion to LED lighting were allocated to the economic activity CCM 7.3. "Installation, maintenance, and repair of energy-efficient equipment."

When considering the share of taxonomy-eligible capital expenditure in the denominator, both the share of non-taxonomy-compliant CapEx (2024: 48.4%, 2023: 11.0%) and the share of taxonomy-compliant CapEx (2024: 0.5%, 2023: 0.0%) increased compared to the previous year. The increase in taxonomy-compliant CapEx is primarily due to the first-time inclusion of the activity CCM 7.7 "Acquisition and ownership of buildings."



### OpEx key figure

The taxonomy-eligible or taxonomy-compliant OpEx indicates the share of operating expenditure (OpEx) within the meaning of the Taxonomy Regulation that is associated either with taxonomy-eligible or taxonomy-compliant economic activities or with the acquisition of products and services from taxonomy-eligible or taxonomy-compliant economic activities.

According to the Taxonomy Regulation, the basis of operating expenditure (denominator) includes direct, non-capitalized costs for research and development, building renovation measures, short-term leases, maintenance and repairs, and all other direct expenditure for the ongoing maintenance of tangible assets by the company or third parties that is necessary to ensure the continued and effective functioning of these assets (for example, cleaning costs).

Operating expenditure [€m]	2024	2023
Research and Development (non-capitalized expenses)	1.0	1
Short-term leasing	0.8	1.2
Maintenance and repairs	38.2	40.9
Any other direct expenses related to the daily maintenance of fixed assets	1.3	1.6
<b>Total</b>	<b>41.3</b>	<b>44.7</b>

For the calculation of the denominator of the Group's OpEx figure, non-capitalized research and development costs, operating expenses for short-term rental and short-term leasing, maintenance and repair expenses, and all cleaning costs were included as other direct expenses related to the daily maintenance of property, plant and equipment. Operating expenses in the denominator amount to €44.7m for the 2024 fiscal year (2023: €41.3m).

The numerator for the operating expenditure ratio was determined based on the analysis of the accounts included in the denominator. The expenditures recorded there were allocated to the respective economic activities, which initially allowed taxonomy eligibility to be determined. The operating expenditures classified as taxonomy-eligible were then reviewed for taxonomy compliance. The same assessment methodology and logic were applied as for capital expenditures.

An exception are operating expenses related to the production of environmentally relevant components for zero-emission vehicles.

Since the investments identified as taxonomy-eligible in connection with the revenue-related economic activity CCM 3.18. "Manufacture of automotive and mobility components" primarily involve research and development costs for a new project, no corresponding operating expenses are yet reflected in OpEx. It is expected that this project will generate additional revenue in the future, and thus corresponding operating expenses will also be incurred.

Overall, the largest share of taxonomy-eligible operating expenses is associated with revenue-related economic activities (CCM 3.3. "Manufacture of low-carbon transport technologies" and CCM 3.21. "Manufacture of aircraft"), as these costs ensure the ongoing functioning of the company. Furthermore, costs for short-term leasing in the area of motor vehicle transport (economic activities CCM 6.5. "Transportation by motorcycles, passenger cars, and light commercial vehicles") as well as costs associated with the maintenance of the associated vehicles were classified as taxonomy-eligible.

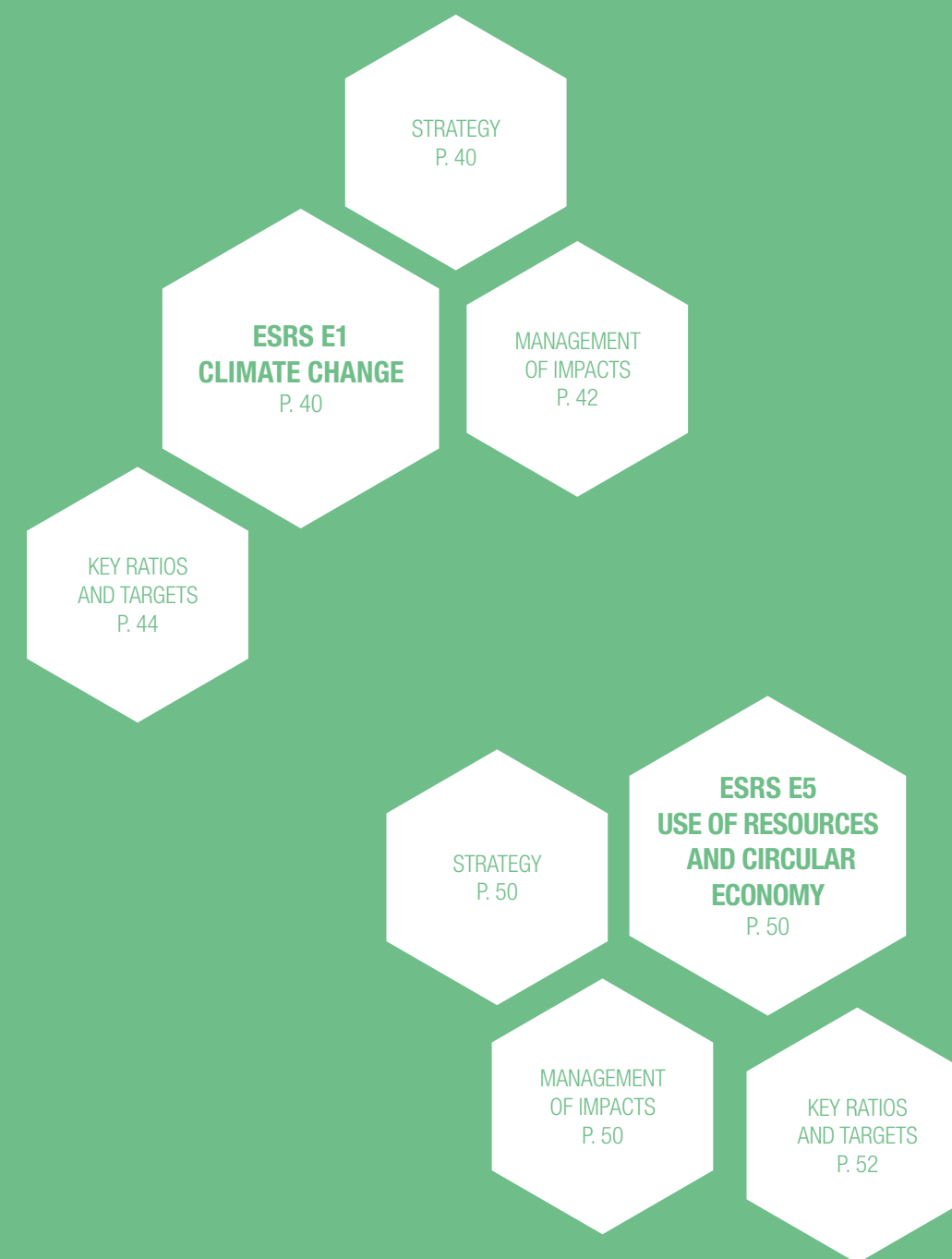
For the taxonomy-eligible operating expenditure of the four economic activities, no taxonomy-compliant shares could be reported because either the relevant evidence was missing or the significant contribution to an environmental objective was not met.

Costs from the acquisition of company bicycles for employees (bicycle leasing), which are classified as low-value assets on the balance sheet, were reported as operating costs and allocated to the economic activity CCM 6.4. "Operation of personal mobility devices, bicycle transport logistics." With this economic activity, the Group made a significant contribution to the environmental objective of "Climate Change Mitigation".

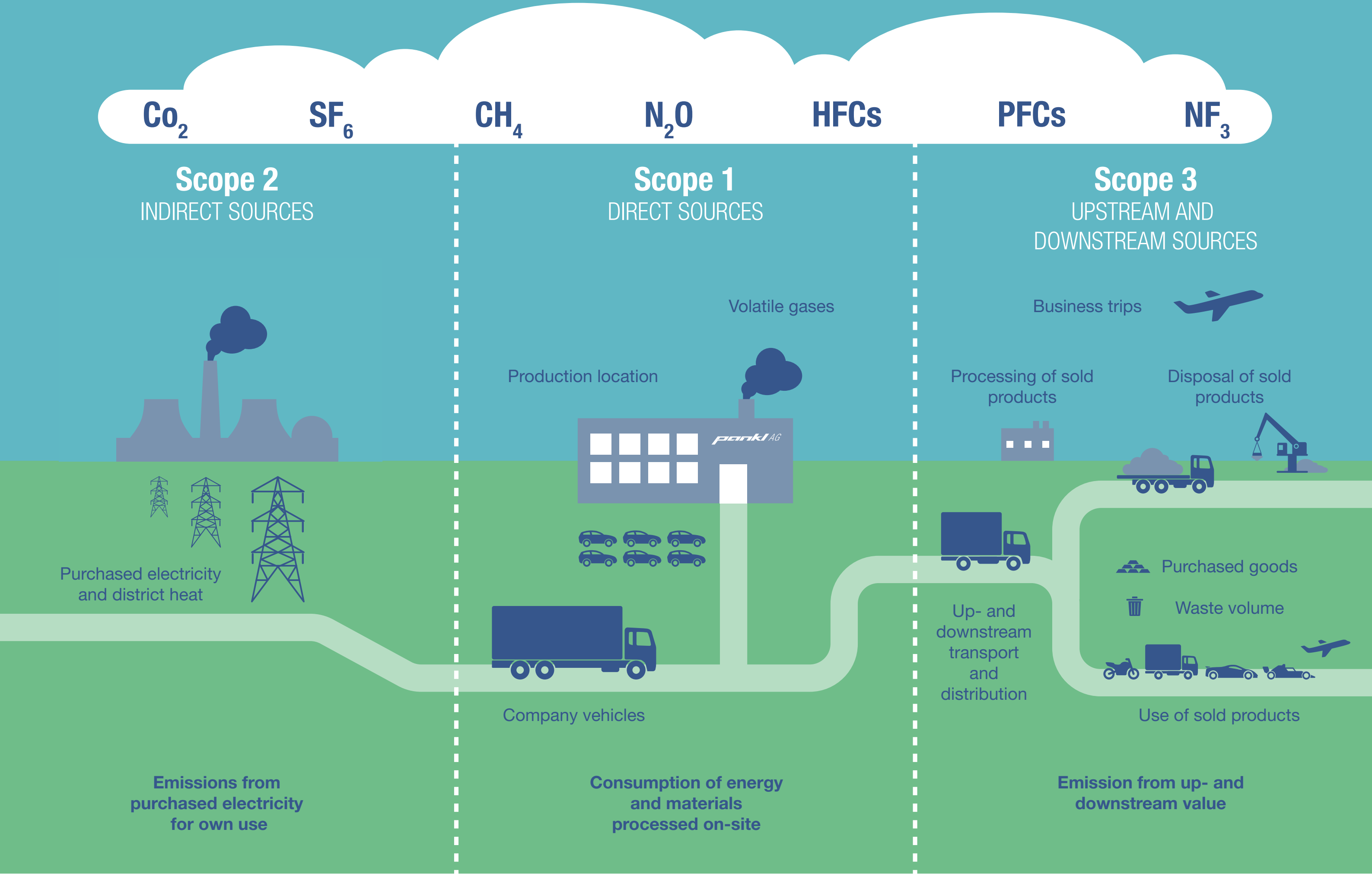
In the 2024 fiscal year, all evidence of compliance with the conformity requirements for the company bicycles was provided, which represents a change compared to the previous year.

Compared to the 2023 fiscal year, there were no significant changes in the amounts in the 2024 reporting year. When considering the share of taxonomy-eligible operating expenses in the denominator operating expenses, the share of non-taxonomy-compliant OpEx (2024: 4.16%, 2023: 4.26%) remained almost unchanged compared to the previous year, while the share of taxonomy-compliant OpEx (2024: 1.76%, 2023: 0.00%) increased slightly





# ENVIRONMENT





# ESRS E1 CLIMATE CHANGE

## STRATEGY

### E1-1 TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

In the 2024 fiscal year, Pankl Group developed a climate protection plan aligned with the Paris Climate Agreement. It will be further developed and finalized in 2025 so that these goals can also be reflected in the balance sheet figures. This plan is intended to ensure that Pankl Group makes its contribution to limiting global warming to a maximum of 1.5°C.

The Climate Protection Plan will become an integral part of the overall business strategy and will also be reflected accordingly in Pankl Group's financial planning. It will be embedded in the short-, medium-, and long-term corporate planning and monitored and adjusted annually. Pankl Group's GHG emission reduction targets are planned as follows:

- **Scope 1 und 2:** Reducing CO<sub>2</sub> emissions by 80% by 2030 (compared to the reference year 2022) and achieving net-zero emissions by 2040 by eliminating avoidable emissions while compensating unavoidable emissions through carbon offset certificates.
- **Scope 3:** Reduction of emissions along the value chain by 20% by 2030 and subsequently a reduction of 60% by 2040.

Pankl Group has identified the following key decarbonization levers, which will be reflected in the final climate protection plan, in order to achieve the GHG emission reduction targets in its own value chain and beyond.

#### Technological innovation and structural changes

- **Process changes:** The gradual increase in the proportion of bio-coking coal in the foundry operations at the Tuttlingen site (Germany) is a key lever for decarbonization. Initial tests for the use of bio-coking coal will begin in fiscal year 2025, with the goal of increasing the proportion to over 50% by 2030. In the long term (target years 2031-2033), a switch to electric melting furnaces is planned.
- **Renewable energy sources:** Fossil-based gas heating systems will be gradually replaced with energy-efficient heat pumps. In addition, biogas will be introduced into the regular gas supply at the German sites (5% by 2026, 15% by 2029).
- **Mobility transition:** Starting in 2025, diesel-powered company vehicles will increasingly be powered by HVO100. A complete conversion will take place by the target year 2030, depending on availability. A similar process is planned for gasoline-powered vehicles using e-fuels.

#### Adjustment of the product and services portfolio

- The aim is to increasingly use low-CO<sub>2</sub> materials and implement supply chains in order to reduce the Scope 3 emissions footprint.

#### Decarbonization of the up- and downstream value chains

- **Logistics:** Focus on alternative fuels through the use of SAF (Sustainable Aviation Fuel) and HVO100.
- **Business trips:** Use of rail for short distances; preference for airline tickets with a higher SAF content.

## ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Topic	IRO	Major impacts, risks or opportunities	Time horizon		
			Short-term	Medium-term	Long-term
Climate Change Mitigation	01	<b>Greenhouse gas emissions (Scope 1 &amp; 2)</b> Pankl Group's sites generate greenhouse gas emissions that contribute to climate change.	Negative (OO)	✓	✓
	02	<b>Greenhouse gas emissions (Scope 3)</b> Greenhouse gas emissions are generated in the Group's upstream and downstream value chain, which contribute to climate change. The majority of these emissions are generated in raw material procurement (3.01).	Negative (VC)	✓	✓
	03	<b>Regulatory novities in the sustainability area with focus on combating climate change</b> Regulatory changes already published or still under development, as well as future ones, may require an adjustment of Pankl Group's business model and represent a climate-related transition risk.	Negative, Risik (OO)	✓	✓
Climate Change Adaptation	04	<b>Transitional risks resulting from the development to a low-greenhouse gas society, such as declining acceptance of combustion engines.</b> Social developments due to climate change and growing environmental awareness may require an adjustment of Pankl Group's business model and represent a climate-related transition risk.	Risik (OO, VC)		✓
Energy	05	<b>Consumption of non-renewable energy in production</b> Non-renewable energy is consumed at the production sites.	Negative (OO)	✓	✓
	06	<b>Generation and use of renewable energy</b> The Group has installed photovoltaic systems and associated infrastructure at various locations for the generation and use of renewable energy.	Positive (OO)	✓	✓
	07	<b>Dependence on a reliable energy supply for production activities</b> A power outage can lead to restrictions in production and assembly processes.	Risik (OO)	✓	✓

The complete integration of climate-related opportunities and risks into Pankl Group's corporate strategy and business model has not yet been completed. Risk management is currently carried out decentrally within the respective departments. A comprehensive risk analysis is planned for the 2025 fiscal year, which will systematically consider climate risks in particular. The aim is to transfer the findings obtained as part of the sustainability statement into an integrated, holistic risk management system across the Group and to further develop them. The additional climate risk and vulnerability analysis of

Pankl Group's production sites will be part of the group-wide risk management process in the future.

As part of this analysis, physical climate risks were assessed based on three climate scenarios and over two time horizons. The results show, among other things, that the Köflach site in particular is at increased risk from flooding events due to increased heavy rainfall.

Further information can be found in section E1-3 "Measures and resources related to climate concepts".

## MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

### E1-2 POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

#### Environmental and sustainability policy and guidelines

The environmental and sustainability policy and guidelines form the framework for environmentally sound actions within the Group. They are updated regularly and published on the company website, where they are accessible to internal and external stakeholders at any time. The Environmental Policy was developed as part of the ISO 14001:2015-certified environmental management system and applies to the entire Pankl Group. Responsibility at the highest level lies with the responsible Management Board member. The Pankl Group's Environmental and Sustainability Policy and Guidelines focus on the Group's own business activities and have an indirect impact on the upstream and downstream value chain, for example, through the reduction of Scope 3 GHG emissions. (IRO 01, 02, 03, 04, 05, 06, 07)

#### Code of Conduct

At the Pankl AG level, a Code of Conduct has been published that applies equally to both subsidiaries and forms the basis for a responsible and ethical corporate culture. It applies to all employees, managers, and board members, as well as to business partners, suppliers, customers, and consultants (collectively referred to as "business partners"). It also forms the basis for business relationships with all business partners (especially suppliers) and is an integral part of the contract. It describes, among other things, Pankl AG's fundamental approach to sustainability, environmental protection, climate protection, and animal welfare. Further information on the Code of Conduct (such as its availability, scope, and relevant responsibilities) can be found in Section G1-1. (IRO 01, 02, 03, 04, 05, 06, 07)

### E1-3 ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

Quantifying the achieved and expected reduction in Greenhouse gas emissions through the measures implemented was not possible in the 2024 fiscal year. Pankl Group plans to quantify the reductions for major projects in subsequent years in order to provide a well-founded assessment of the potential reductions. Financial, human, organizational, and material resources were allocated to the management of the key IROs related to climate change and climate change adaptation so that the measures mentioned could be initiated or implemented.

#### Property management measures

To reduce the climate and environmental impacts at their locations, the subsidiaries are implementing measures to increase energy efficiency and promote renewable energies. (IRO 01, 03, 05, 06, 07)

- **Generation of renewable energy from photovoltaics:** In Bruck upon Mur and Haimen, China, the commissioning of photovoltaic modules on the roofs with a capacity of 100 kWp and 850 kWp, respectively, was completed in 2024. The electricity generated from renewable sources is purchased by the company in China and used entirely for its own needs. This increases the share of renewable energy in total consumption. This will contribute to a reduction in Scope 1 and 2 greenhouse gas emissions in the future. (IRO 01, 03, 06, 07)
- **Time-switch functions:** By introducing time-switch functions and setback mode, Pankl Group can control the ventilation systems in Bruck upon Mur according to demand. Significant savings potential exists, particularly through control times co-ordinated with weekends and shift work. Measurable savings have already been achieved with ventilation systems LÜ2 (with a consumption of approximately 10,000 kWh per month) and LÜ4 (approximately 5,000 kWh per month). (IRO 01, 03, 05, 07)
- **Energy monitoring:** In Kunshan, 80% of electricity consumption is already recorded using energy monitoring. Energy meters have also been added, and energy management software has been integrated at the Bad Schusened site in Germany. Precise energy and consumption data analysis using smart meters enables more efficient energy use. (IRO 01, 03, 05, 07)
- **Flood protection:** Due to an identified flood risk at the Köflach site, flood protection was constructed in 2024 in collaboration with the state and municipality near the nearby stream. Completion is scheduled for Q1 2025. (IRO 03)

#### Further measures to improve efficiency

Efficiency improvements are a key method for reducing resource use and GHG emissions. The following measures were implemented in fiscal year 2024 (IRO 01, 03, 05, 07):

- **Compressed air reduction:** At the Bruck upon Mur site, a compressed air line with a 2000-liter storage tank was installed for the newly acquired shot peening system. The storage tank enables efficient compressed air supply to the system by absorbing pressure peaks and more evenly distributing the load across the compressed air system. This reduces energy losses and increases operating efficiency. (IRO 01, 03, 05, 07)
- **VFD air compressor:** A VFD air compressor was installed in Kunshan, reducing energy consumption by 20%. A VFD (variable frequency drive) air compressor offers numerous advantages. Its use increases energy efficiency and flexibility in industrial applications. (IRO 01, 03, 05, 07)

#### Other measures

- **Certifications:** In 2024, the Kunshan site was audited according to ISO 50001 for energy management, making it the Group's fifth site to receive this certification. The implementation of the energy management system underscores the commitment to sustainable optimization of energy consumption. (IRO 03, 04)

## KEY RATIOS AND TARGETS

## E1-4 TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

Pankl Group's climate protection plan is aligned with the Paris Climate Goals to limit global warming to a maximum of 1.5°C. The Pankl Group's GHG emission reduction targets are as follows:

- **Scope 1 and 2:** Reduction of CO<sub>2</sub> emissions by 80% each by 2030 (compared to the reference year 2022) and achievement of net zero emissions by 2040, where avoidable emissions are eliminated while unavoidable emissions are offset through carbon offset certificates. (IRO 01)missionen durch Carbon-Offset-Zertifikate kompensiert werden. (IRO 01)
- **Scope 3:** Reduction of CO<sub>2</sub> emissions along the value chain by 20% by 2030 and 60% by 2040 (IRO 02)

## E1-5 ENERGY CONSUMPTION AND ENERGY MIX

ESRS E1-5 37-38 Energy consumption and energy mix [MWh]	2024
1) Fuel consumption from coal and coal products	74,683.80
2) Fuel consumption from crude oil and crude oil products	4,841.05
3) Fuel consumption from natural gas	43,254.91
4) Fuel consumption from other fossil sources	0
5) Consumption of acquired or received electricity, heat, steam and cooling from fossil sources	14,555.17
<b>6) Total consumption of fossil energy (sum 1-5)</b>	<b>137,334.93</b>
Share of fossil sources in total energy consumption [%]	0.525
<b>7) Consumption from nuclear sources</b>	<b>5,022.02</b>
Share of nuclear sources in total energy consumption [%]	0.02
8) Fuel consumption for renewable sources, including biomass (including industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources, etc.)	238.08
9) Consumption of electricity, heat, steam and cooling purchased or received from renewable sources	118,421.47
10) Consumption of self-generated renewable energy that is not fuel	736.41
<b>11) Total consumption of renewable energy (sum 8-10)</b>	<b>119,395.96</b>
Share of renewable energy in total energy consumption [%]	0.46
<b>Total energy consumption (sum of lines 6, 7 and 11)</b>	<b>261,752.91</b>

Due to the complexity of data collection and structuring, it is currently not possible to report the values for Pankl Racing and SHW separately.

## PRODUCTION OF ENERGY

ESRS E1-5 39 Energy source [MWh]	Pankl AG	Pankl Racing	SHW
Renewable (Photovoltaik)	736.41	736.41	-
Non-renewable	-	-	-

## E1-6 GHG EMISSIONS OF CATEGORIES SCOPE 1, 2 AND 3 AS WELL AS GHG TOTAL EMISSIONS

ESRS E1-6 48-52	Pankl AG	Pankl Racing	SHW
<b>Scope-1-GHG gross emissions</b> [tCO <sub>2</sub> e]	<b>37,617.81</b>	<b>3,501.22</b>	<b>34,116.59</b>
Percentage of Scope 1 greenhouse gas emissions from regulated emissions trading systems [%]	-	-	-
<b>Scope-2-Greenhouse gas emissions</b> [tCO <sub>2</sub> e]			
<b>Location-based Scope-2 GHG gross emissions</b>	<b>39,463.20</b>	<b>11,331.33</b>	<b>28,131.87</b>
<b>Market-based Scope-2 GHG gross emissions</b>	<b>9,125.20</b>	<b>7,744.31</b>	<b>1,380.89</b>
<b>Scope-3-Greenhouse gas emissions</b> [tCO <sub>2</sub> e]			
<b>Total indirect (Scope-3) GHG gross emissions</b>	<b>328,732.24</b>	<b>96,515.53</b>	<b>232,216.71</b>
1 Acquired goods and services	282,873.05	80,125.09	202,747.96
2 Capital goods	16,520.39	4,685.70	11,834.69
3 Activities related to fuels and energy (not included in Scope 1 or Scope 2)	15,614.06	3,915.01	11,699.05
4 Upstream transport and distribution	3,439.37	2,686.22	753.15
5 Waste generation in companies	201.30	61.26	140.04
6 Business trips	818.71	415.54	403.17
7 Commuting workers	4,154.87	2,822.79	1,332.08
8 Upstream leased assets	-	-	-
9 Downstream transport	4,297.34	1,391.37	2,905.97
10 Processing of sold products	478.40	175.94	302.46
11 Use of sold products	-	-	-
12 Treatment of products at the end of their life cycle	334.75	236.61	98.14
13 Downstream leased assets	-	-	-
14 Franchise	-	-	-
15 Capital expenditure	-	-	-



VALUATION PRINCIPLES AND ASSUMPTIONS

PRINCIPLES AND ASSUMPTIONS REGARDING E1-5 ENERGY CONSUMPTION AND ENERGY MIX

ESRS E1-6 48-52 [tCO <sub>2</sub> e]	Pankl AG	Pankl Racing	SHW
Total GHG emissions (location-based)	408,303.50	111,263.13	297,040.37
Total GHG emissions (market-based)	377,965.50	107,676.11	270,289.39

The energy intensity from activities in climate-intensive sectors per net sales revenue from activities in climate-intensive sectors amounted to 2.29 MWh / €m in the 2024 fiscal year.

ESRS E1-6 54 TGHG intensity per net revenues [tCO <sub>2</sub> e/€]	Pankl AG
Total GHG emissions (location-based) per net revenues	0.46
Total GHG emissions (market-based) per net revenues	0.42

ESRS E1-7 GHG REMOVALS AND GHG MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

ESRS E1-7 56 – 60

In the 2024 reporting year, natural gas consumption at SHW's German sites was offset through TÜV-certified offsets. The closure took place after the energy supplier verified the supplied quantities and was carried out via a recognized CO<sub>2</sub> register. These offsets serve as balance compensation and are not part of the direct emission reduction targets. For the years 2023 and 2024, SHW and the energy supplier contractually agreed that a CO<sub>2</sub> reduction right would certify the appropriate savings of one ton of CO<sub>2</sub> equivalent. The selection and quality assurance of the certificates used is the sole responsibility of the energy supplier. Pankl Group has no direct influence on the selection of projects or the quality of the emission reduction certificates used. The certificates were generated outside the company's value chain.

A total of 4,907.9 tons of CO<sub>2</sub> equivalent were offset. This corresponds to 100% of Scope 1 emissions from natural gas use at the aforementioned sites. This measure is part of the transition plan developed in accordance with ESRS E1-4 and supports the implementation of the Pankl Group's decarbonization strategy within the framework of the targeted net-zero target.

Removal [tCO <sub>2</sub> e]	2024
GHG removal activity	0
Total removal of greenhouse gases from own activities	0
Total removal of greenhouse gases in up- and downstream value chains	4,907.90
Reversals	0

Data point, disclosure	Description
Energy consumption and energy mix (E1-5 37 a-c, 38 a-e, 39)	Consumption and activity at the respective locations were recorded directly. Depending on location, the collected data was based on invoices or meter readings.
Energy intensity of activities in climate intensive sectors (E1-5 40)	To determine the energy intensity per net revenue associated with activities in climate-intensive sectors, the ESRS classification was used. Accordingly, the sectors listed in Section H of Regulation (EU) 2022/1288 are to be classified as climate-intensive. Corresponding business sectors were considered in the analysis. Activities related to manufacturing were also included.

PRINCIPLES AND ASSUMPTIONS REGARDING E1-6 GHG GROSS EMISSIONS

Data point, disclosure	Description
GHG gross emissios, general disclosure	The greenhouse gas emissions (GHG emissions) of the subsidiaries were calculated based on the requirements of the GHG Protocol. Emission factors were used that take into account the climate-relevant greenhouse gases CO <sub>2</sub> , CH <sub>4</sub> , N <sub>2</sub> O, HFCs, PFCs, SF <sub>6</sub> , and NF <sub>3</sub> , collectively referred to as CO <sub>2</sub> e. Further information on the emission factors used can be found in direct connection with the scopes. Consumption and activities at the Pankl Group locations were recorded directly. For goods where the available consumption and activity data were incomplete, previous year's values were used or estimates were calculated. GHG emissions were calculated using the most recently publicly available emission factors from the specified sources. Data accuracy and reliability of results: Due to the use of system data and emission factors, the GHG balance is subject to a certain degree of inaccuracy.
Scope-1 Greenhouse gas emissions (E1-6 48a-b, 50a-b)	Scope 1 GHG emissions include emissions directly emitted by the subsidiaries (combustion processes). These include emissions from process gases, local heating systems, test benches, coolants, and the Group's vehicle fleet. Emission factors from the UK Department for Energy Security and Net Zero (DESNZ) were used to calculate GHG emissions. Fugitive emissions were determined based on sales estimates, supported by the data reported by the respective companies. Biogenic emissions were taken into account through the choice of emission factors. For Pankl Group, biogenic emissions from fuel consumption could be calculated and reported and amount to 42.4 tCO <sub>2</sub> e.
Scope-2 Greenhouse gas emissions (E1-6 49a-b, 50 a-b)	Scope 2 GHG emissions were determined using both the market-based and site-based methods. Emission sources include district heating and electricity consumption. Increased emphasis was placed on the use of market-specific emission factors for the market-based method. Some locations in Austria and Germany source electricity from renewable sources, as contractually agreed. Where a supplier-specific emission factor was available, this was used. Market-based emission factors were not available for the other locations, so the emission factors from the site-based method were adopted. Site-based emission factors were used for 24.4% of the energy consumed (in kWh). DESNZ emission factors and factors from the IPCC database were used for the site-based method.
Scope-3 Greenhouse gas emissions (E1-6 51)	The calculation of Scope 3 GHG emissions is based on activity data from subsidiaries and related emissions in the upstream and downstream value chain.  In the Pankl Group, only <1% of primary data from suppliers was used to calculate transport emissions in Scope 3.4 and business travel emissions in Scope 3.6. The data collection in the companies without primary data was conducted using ERP extracts. Emissions factors from DESNZ were used.
3.1 Acquired goods and services	To determine the GHG emissions associated with purchased goods and services, the purchased materials were evaluated from the companies' ERP systems or invoices and summed up based on product groups by quantity and calculated using the average data method with DESNZ emission factors and the German Federal Office for Economic Affairs and Export Control (BAFA).

Data point, disclosure	Description
3.2 Capital goods	GHG emissions from capital goods were calculated using the expenditure-based approach based on CapEx data. For this purpose, the Pankl Group used emission factors from the Industrial Ecology and Sustainability Research Institute (EXIOBASE).
3.3 Activities related to fuels and energy (not included in Scope 1 or 2)	The calculation of GHG emissions from activities related to fuels and energy (well-to-tank) is based on the input values for Scope 1.01 and Scope 2.01. At Pankl Group, the calculation of GHG emissions from upstream activities related to fuels and energy (well-to-tank) was based on the recorded consumption values along the upstream chain. This included upstream emissions from natural gas consumption, purchased electricity, gasoline and diesel production, district heating, and vehicle production. The emission values from DESNZ were used to calculate GHG emissions.
3.4 Upstream transport and distribution	GHG emissions from transport and distribution in the upstream value chain of Pankl Group are based on primary data from logistics service providers or ERP extracts from the companies. After recording the tonne-kilometers (tkm), resulting GHG emissions were calculated using the distance data method based on DESNZ, Global Logistics Emissions Council (GLEC)6 emission factors.
3.5 Waste generation in companies	GHG emissions from waste and its disposal in the Pankl Group are based on data from waste management companies. After recording the quantity per waste code, the resulting GHG emissions were calculated using the average data method based on DESNZ emission factors.
3.6 Business trips	GHG emissions in the Pankl Group are based on reports from car rental companies and flights recorded by the travel department or travel agencies. After recording the kilometers and miles, resulting GHG emissions were calculated using the distance data method based on DESNZ emission factors and factors from Mobitool (v3.0).
3.7 Commuting workers	When calculating the GHG emissions generated by employees' commutes, an analysis by Pankl Racing Systems AG, which recorded the mobility behavior of its employees, was used as a basis for the entire group. Due to the similar conditions of the companies, it was considered appropriate to apply this analysis to all subsidiaries of the group. After recording mobility behavior, resulting GHG emissions were calculated using the average data method based on DESNZ emission factors and factors from Mobitool (v3.0).
3.8 Upstream leased assets	This is an insignificant category. Consequently, no GHG emissions are reported in this sub-scope.
3.9 Downstream transport	GHG emissions from transport and distribution in the downstream value chain within Pankl Group are based on estimates. The estimate is based on the annual number of units delivered per location, a staggered assumption of the average distance to the main customers, and an assumption of the number of units per delivery based on weight classes. Multiplying the estimated number of deliveries by the respective distance results in the total transported distance per location. This was broken down by means of transport (truck or van). After recording the transport kilometers, the resulting GHG emissions were calculated using the distance data method based on DESNZ and Global Logistics Emissions Council (GLEC) emission factors.
3.10 Processing of sold products	The recording of the processing of Pankl Group's sold products is based on the quantities delivered by the companies, which were calculated using estimated calculations for the respective component types (kgCO <sub>2</sub> e), and thus the internal calculations were included in the balance sheet. Since the Pankl Group's products in question are mechanical interim components, only the assembly step was taken into account. CO <sub>2</sub> equivalents (kg CO <sub>2</sub> e) were calculated for the different component types using estimated calculations and included as internal values in the balance sheet. For the assembly step, the company's internal emission value from the ERP-based PCF calculator was used and multiplied by the number of units sold per location. It is assumed that similar CO <sub>2</sub> emissions occur at the customer's site during assembly, as these work steps are predominantly carried out manually or with little electrical effort. For these, an emission factor of 20 g CO <sub>2</sub> e per delivered component in the automotive sector or 50 g CO <sub>2</sub> e per component in the aerospace sector was used, depending on the area of application.

Data point, disclosure	Description
3.11 Use of sold products	This is an insignificant category. Consequently, no GHG emissions are reported in this sub-scope.
3.12 Treatment of products at the end of their life cycle	Due to the specific design of the components and the materials used, it is assumed that Pankl Group products can be 100% recycled at the end of their service life. However, since the components are permanently installed, the actual recycling is beyond the control of Pankl Group. The underlying assumption in Category 3.12 is based on the return of metal scrap to the material cycle – both that which arises during production and that which arises during product disposal. Accordingly, the metals used for product manufacturing and the resulting waste were recorded for each company in Category 3.12.
3.13 Downstream leased assets	This is an insignificant category. Consequently, no GHG emissions are reported in this sub-scope.
3.14 Franchise	This is an insignificant category. Consequently, no GHG emissions are reported in this sub-scope.
3.15 Capital expenditure	This is an insignificant category. Consequently, no GHG emissions are reported in this sub-scope.
Greenhouse gas intensity of products (E1-6 54)	To determine the GHG intensity per net revenue, the total GHG emissions (location- and market-based) taking all business sectors into account were used as the denominator. The numerator is composed of the total net sales revenue

PRINCIPLES AND ASSUMPTIONS REGARDING E1-7 GHG REMOVALS AND GHG MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

Data point, disclosure	Description
ESRS E1-7 56 – 61	The values were calculated as part of the greenhouse gas footprint by including Pankl Group's natural gas consumption in its greenhouse gas footprint. Natural gas consumption was partially offset by TÜV-certified offsets. The closure took place after TÜV-certified verification of the supplied quantities by the energy supplier and was carried out via an accredited CO <sub>2</sub> register. These offsets serve as compensation for the balance sheet and are not part of the direct emission reduction targets. It is contractually stipulated that a CO <sub>2</sub> reduction right shows the certified saving of one ton of CO <sub>2</sub> equivalent. The selection and quality assurance of the certificates used is the sole responsibility of the energy supplier. Pankl Group has no direct influence on the selection of projects, or the quality of the emission reduction certificates used. The certificates were generated outside the company's value chain. Natural gas consumption was included in the GHG footprint, and the total quantity of CO <sub>2</sub> certificates was determined by applying the Es emission factor from DBEIS.



# ESRS E5 RESOURCE USE AND CIRCULAR ECONOMY

## STRATEGY

ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Topic	IRO	Major impacts, risks or opportunities		Time horizon		
				Short-term	Medium-term	Long-term
Inflow of resources	08	<b>Consumption of primary and secondary materials in production processes</b> Primary and secondary materials, such as aluminum, steel, and titanium, are necessary to manufacture products.	Negative (VC)	✔	✔	✔
	09	<b>Risk of supply chain delays and limited material availability</b> Supply chain delays and limited material availability can slow the production process. This represents a significant risk	Risik (VC, OO)	✔	✔	✔
Outflow of resources	10	<b>Long-term resource tie-up in products and incomplete resource cycle</b> Valuable resources and raw materials are tied in the Group's products for the long term. After the end of the product life cycle, there is no guarantee that all raw materials will be returned to the cycle.	Negative (OO, VC)		✔	✔
	11	<b>Resource outflows related to products and services, reusability, and the metals cycle</b> Raw materials are returned to the cycle via external service providers.	Positive (VC)			✔
Waste	12	<b>Waste generation (non-hazardous and hazardous) from production processes</b> Waste is generated in production processes due to the use of valuable resources.	Negative (OO, VC)	✔	✔	

## MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

### E5-1 POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

#### Code of Conduct

The Group's Code of Conduct forms the basis for a responsible and ethical corporate culture and is binding for all employees, managers, board members, and business partners. Further information on the Code of Conduct (such as its availability, scope, and relevant responsibilities) can be found in Section G1-1. (IRO 08, 09, 10, 11, 12)

### E5-2 ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

The conservation of natural resources is a multifaceted process and can be viewed from various perspectives: product design, material use, and process perspective. For example, the appropriate selection of materials for the Pankl Group's components extends product life. The use of alternative raw materials (such as secondary plastics) can promote the circular economy.

#### Promoting the circular economy using secondary raw materials

The Group strives to consider the climate and environmental impacts of its products during their design and throughout their entire life cycle. This results in longer-lasting, easily repairable products that can be disassembled into reusable or recyclable parts and materials at the end of their useful life. (IRO 08, 09, 10, 11, 12)

#### Resource conservation in production and development processes

The Group is continually taking measures to reduce resource consumption.

- **Research & Development:** Pankl Group's research and development strategy focuses on resource efficiency and lightweight construction, thus combining economic goals with ecological responsibility. A key approach is targeted training for designers in the efficient use of materials and in ensuring disassembly and recyclability. Innovative technologies such as topology optimization reduce the consumption of materials such as aluminum, steel, and titanium. These measures not only conserve resources but also contribute to long-term CO<sub>2</sub> savings in vehicle operation. Materials are selected in close collaboration with partners and optimized through validation to ensure maximum performance. (IRO 08, 10, 11)
- **Packaging management:** Optimizing material flows within Pankl Group, both to and from production, is a key aspect of efficient supply and disposal processes. In this context, the use of reusable packaging has been a promising approach throughout Pankl Group for years. In Köflach, a switch to lighter VCI packaging was implemented in 2024, thereby reducing packaging materials and the resulting waste. (IRO 12)
- **Chemical consumption:** Pankl Group achieved a reduction in chemicals and die lubricant consumption through control in the central production plan and specifying concentrations at the Köflach site. (IRO 11, 12)
- **Projekt HADES:** In 2024, Pankl Racing launched the company-wide purchasing project HADES (Harmonized Acquisition and Diligence Efficiency System) to make the procurement process more efficient and sustainable. As part of this project, a comprehensive manual is created that clearly outlines all requirements and defines clear purchasing guidelines, including specific specifications for procurement from various suppliers. Potential supplier portals are also evaluated to ensure that the defined requirements are met. The target is a response rate of 80% of product-relevant suppliers. A central documentation system for the efficient recording and management of all requested documents is established. Furthermore, a solution is being implemented to ensure compliance with legal and regulatory requirements in the supply chain. (IRO 08, 09, 10)
- **Energy saving measures** are described in more detail in section E1-3.



#### Measures to address the risk of delayed deliveries or limited material availability

To minimize risks in the supply chain, Pankl Group also relies on multi-level risk management. A key measure is the use of a digital monitoring tool that continuously analyzes Tier 1 suppliers and identifies potential disruptions or bottlenecks at an early stage. This tool expands the existing internal risk matrix with a well-founded external perspective on the risk situation of individual suppliers. (IRO 10)

### KEY RATIOS AND TARGETS

#### E5-3 TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

No objectives have yet been defined regarding the IROs related to resource use and the circular economy. The effectiveness of the concepts and measures related to the key IROs is monitored individually by the responsible departments. However, there is still no overarching process for monitoring effectiveness.

#### E5-4 INFLOW OF RESOURCES

##### Company-specific disclosures – used materials by weight

E5-4 [t]	Pankl AG	Pankl Racing	SHW
Acetylene	1.43	1.43	-
Aluminum	11,835.16	3,349.50	8,485.66
Argon	111.79	111.79	-
Building sand	13,564.47	-	13,564.47
Bentonite	7,536.62	-	7,536.62
Bronze	0.53	0.53	-
Elastomers	17.12	-	17.12
Electrode graphite - Ranco	414.00	-	414.00
Electronic	69.67	-	69.67
Ferro-chromium	56.00	-	56.00
Ferro-manganese	219.88	-	219.88
Ferro-molybdenum	73.50	-	73.50
Ferro-silicon	412.04	-	412.04
Resins and hardeners	402.40	-	402.40
Wood	243.19	150.96	92.23
Inoculin	121.37	-	121.37

E5-4 [t]	Pankl AG	Pankl Racing	SHW
Limestone	3,027.90	-	3,027.90
Plastics	594.35	506.96	87.39
Copper	109.05	24.96	84.09
Paint	75.21	3.46	71.75
Magnesium	0.27	0.27	-
Mineral oil	45.78	45.78	-
Sodium chloride	0.50	0.50	-
Sodium hydroxide	8.80	8.80	-
Natural rubber	3.31	-	3.31
Nickel	77.16	77.16	-
Paper and cardboard	244.48	134.59	109.89
Hydrochloric acid	13.20	13.20	-
Oxygen	5,957.67	6.84	5,950.83
Sizing water	889.20	-	889.20
Lubricating oil	196.42	148.26	48.16
Silicon carbide	3,008.14	-	3,008.14
Steel	122,481.68	18,662.82	103,818.86
Nitrogen	5,518.45	392.16	5,126.29
Titanium	367.70	367.70	-
<b>Total</b>	<b>177,698.44</b>	<b>24,007.67</b>	<b>153,690.77</b>



ESRS E5-4 31A-C Removal	Unit	Pankl AG	Pankl Racing	SHW
<b>Total weight of used products and materials</b>	<b>t</b>	<b>177,698.44</b>	<b>24,007.67</b>	<b>153,690.77</b>
Proportion of sustainably sourced biological materials in the total weight	%	0	0	0
Of which used, reused or recycled secondary components, products or materials	t	46,494.06	1,625.92	44,868.14
Proportion of used, reused or recycled secondary components, products or materials	%	0.26	0.07	0.29

## E5-5 OUTFLOW OF RESOURCES / WASTE

Pankl Group's core business is the manufacture of metal products. These products are categorized as drivetrain, engine, chassis, and aerospace components, as well as brake discs. The products have a service life of several years under normal use and can be disassembled. This allows a large proportion of the materials used to be recycled. Lightweight construction is a priority for drivetrain, engine, and chassis components.

### ESRS E5-5 36A-C

The service life of Pankl Group products depends largely on the end customer's usage. For drivetrain, engine, and chassis components, an average lifetime of 80,000 to 120,000 km is assumed.

The values vary depending on the vehicle type

- Standard production vehicles: 120,000 – 150,000 km
- High-performance vehicles: 60,000 – 80,000 km

Racing components are specifically designed for the extreme stresses and performance demands of motorsports. Due to the high mechanical and thermal stresses, these components have a short service life. This is because they are optimized for maximum efficiency and performance with low weight, which accelerates material fatigue.

Series products such as engine components, drive-train systems, pumps, and brake discs are specifically engineered for a long service life. Production is strictly tailored to specific customer requirements. As a result, service lives can vary depending on the product and application – from the entire service life of the vehicle to specific mileage or flight hour limits. They are designed to outlast their service life under normal operating conditions. This is ensured by comprehensive material testing and strict quality controls.

Aerospace components are designed for an average service life of approximately 8,000 flight hours. Maintenance is performed "on condition," meaning the condition of each individual component is checked individually. The prescribed maintenance intervals are 500 flight hours, after which a condition assessment is performed to determine continued use or replacement.

The comparative values are based on expert surveys and industry comparisons. Due to the high influence of the type of use, the durability of components can vary considerably. Approximately 95% of products and their packaging (reusable packaging is not included) are recyclable.

ESRS E5-5 37 A-D [t]	Pankl AG	Pankl Racing	SHW
<b>Total waste</b>	<b>49,643.61</b>	<b>9,020.84</b>	<b>40,622.77</b>
Total waste for recycling	40,763.44	7,471.14	33,292.30
Waste for recycling – preparation for recycling	23,993.10	59.99	23,933.11
Of which non-hazardous waste	23,993.10	59.99	23,933.11
Of which hazardous waste	0	0	0
Waste for recycling - recycling	16,770.34	7,411.16	9,085.80
Of which non-hazardous waste	16,770.34	7,411.16	9,085.80
Of which hazardous waste	0	0	0
Waste for recycling – other utilization measures	0	0	0
Of which hazardous waste	0	0	0
Total waste for disposal	8,880.17	1,549.70	7,330.48
Waste for disposal – incineration	740.30	360.01	380.30
Of which non-hazardous waste	354.98	245.34	109.65
Of which hazardous waste	385.32	114.67	270.65
Waste for disposal – landfilling	7,596.08	733.97	6,862.11
Of which non-hazardous waste	5,126.20	1.76	5,124.44
Of which hazardous waste	2,469.88	732.21	1,737.67
Waste for disposal – other disposal measures	543.79	455.72	87.92
Of which non-hazardous waste	0	0	0
Of which hazardous waste	543.79	455.72	87.92
Of which radioactive waste	0	0	0
Non-recycled waste	32,873.27	1,609.68	31,263.59
Non-recycled waste – share of total waste [%]	66.22	17.84	76.96
<b>Total hazardous waste</b>	<b>3,411.38</b>	<b>1,314.99</b>	<b>2,096.39</b>
<b>Total non-hazardous waste</b>	<b>46,232.24</b>	<b>7,705.85</b>	<b>38,526.38</b>



## ESRS E5-5 38 A-B

Within Pankl Group, a significant proportion of non-hazardous metallic waste is generated, such as steel, aluminum, and casting residues, which arise during machining and foundry processes. These contain valuable secondary raw materials and are recycled. In addition, non-metallic mineral waste such as used foundry sand, furnace slag, and core scrap are generated. These contain quartz sand, ceramic components, and mineral binders and are either recycled or disposed of, depending on the level of contamination. In the packaging and logistics sectors, waste consists of wood, plastics, paper, cardboard, and, to a lesser extent, textiles. These materials are collected separately and predominantly recycled for material or energy recovery.

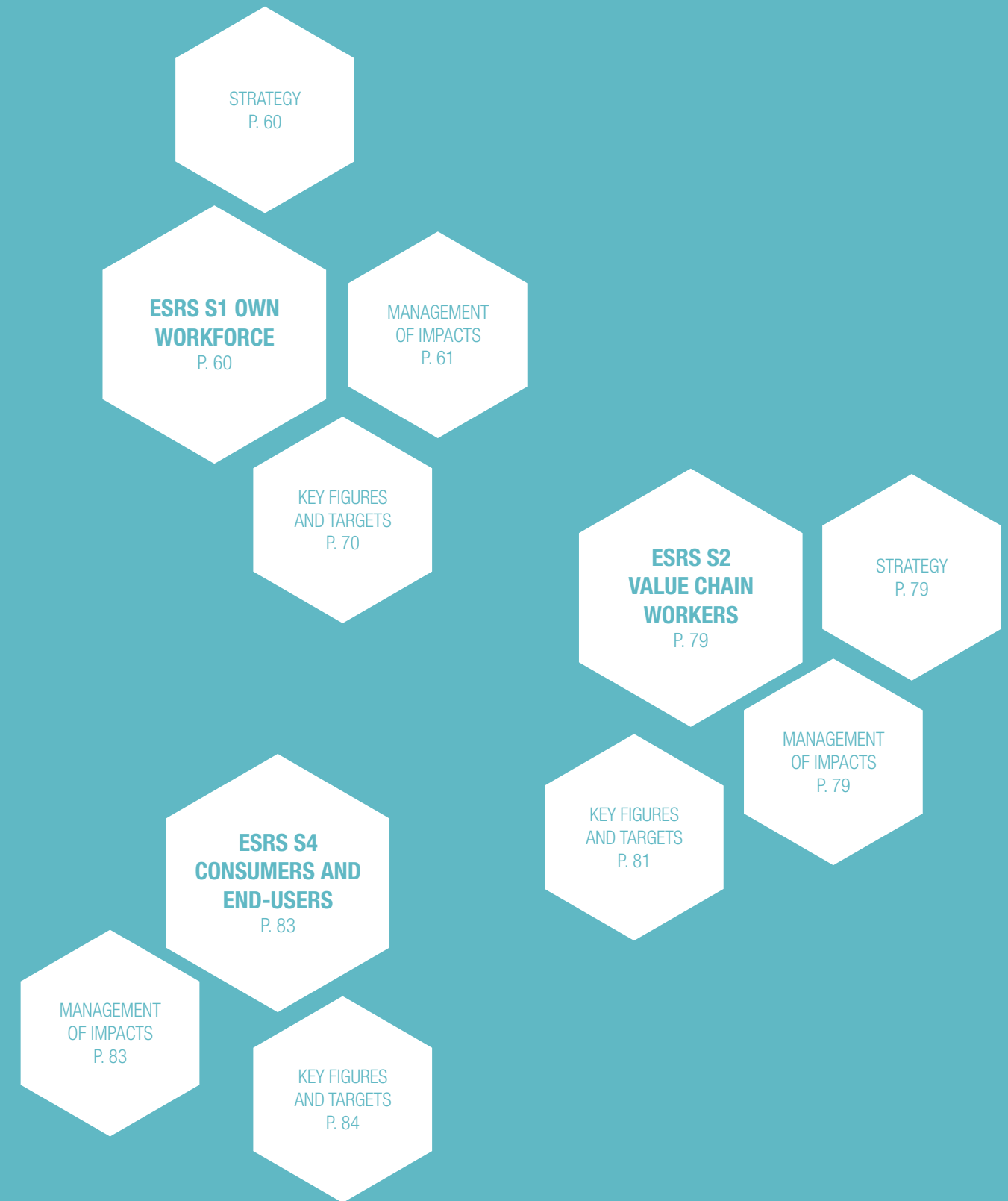
Hazardous waste such as waste oil, solvents, paint residues, and oil-based operating materials contain, among other things, chemical residues. These are treated in accordance with legal requirements by specialized waste disposal companies. Biomass-containing waste (e.g., green waste, canteen leftovers) is of secondary importance in terms of quantity but is collected and recycled separately. Rare earths and critical raw materials are present only to a very small extent in the company's general manufacturing process, for example, in the form of alloy components in scrap metal or small electronic devices. These are treated separately and processed externally during the disposal of electronic waste.



## VALUATION PRINCIPLES AND ASSUMPTIONS

ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
Company-specific disclosures – used materials by weight			The materials used are determined based on the purchases recorded in the ERP systems. The purchased materials are analyzed and assigned to the respective material groups, with the quantities specified accordingly.
E5-4	30	Description of inflow of resources	<p>For the method used to record the total weight of products and materials used by the companies, please refer to the company-specific information "Materials used by weight." An attempt was made to obtain a more comprehensive picture of the value chain using the Value Chain Risk Analysis.</p> <p>No percentage of sustainably sourced organic materials could be reported. To be classified as sustainable, a raw material must be certified according to a recognized certification system. Due to the aggregation of resource inflows at the product group level, this detailed evaluation and, consequently, the reporting of the percentage of sustainably sourced organic materials is not possible. The materials used in Pankl Group are determined based on the procurement data systematically recorded in the ERP system. The purchased materials are analyzed as part of an evaluation, classified according to defined material groups, and recorded in quantity.</p>
E5-5	36a	Expected durability	The durability information refers to the possible mileage of the drivetrain, engine and chassis components and, in the case of aerospace components, to flight hours.
E5-5	36b	Repairability	Due to the permanently installed components, Pankl Group cannot guarantee repairability.
E5-5	36c	Recyclable content in products and packaging	The materials aluminum, bronze, ferro-chromium, ferro-manganese, ferro-molybdenum, ferro-silicon, wood, inoculin, copper, magnesium, nickel, paper, steel, and titanium were classified as recyclable and the proportions in the products and packaging were reported accordingly.
E5-5	38 a-b	Waste streams	The waste streams are derived from the waste codes of the respective countries and are consolidated across Pankl Group.





# SOCIAL

## ESRS S1 OWN WORKFORCE

### STRATEGY

#### ESRS 2 SBM-3 MAJOR IMPACTS RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH THE OWN WORKFORCE

Topic	IRO	Major impacts, risks or opportunities		Time horizon		
				Short-term	Medium-term	Long-term
Secure employment	13	<b>Restructuring can lead to uncertainty, dismissals, and dissatisfaction</b> Restructuring measures can lead to dismissals, uncertainty, and dissatisfaction among employees.	Negative (OO)	✓	✓	
Occupational safety and health protection	14	<b>Occurrence of (serious) work-related accidents in production</b> (Serious) work-related accidents, especially among production employees, cannot always be avoided.	Negative (OO)	✓	✓	✓
Training and skills development	15	<b>Securing future prospects and skills development for employees through continuing education opportunities</b> Through continuing education opportunities, the Group secures the future prospects of its employees and contributes to their skills development.	Positive (OO)	✓	✓	✓
Equal treatment and equal opportunities	16	<b>Intercultural collaboration and individual development</b> The group brings together people from many different nationalities and age groups, creating new impulses and allowing employees to learn from each other.	Positive (OO)	✓	✓	✓
	17	<b>Gender inequalities in pay and leadership positions</b> The group has a male-dominated workforce, both in the overall workforce and among management positions. The gender pay gap is 32.56% (systemic).	Negative (OO)	✓	✓	✓
Data protection	18	<b>Risk of data loss or misuse</b> A potential loss or misuse of personal data infringes on the rights of the data subjects (systemic).	Negative (OO)	✓	✓	✓
	19	<b>Violation of data protection regulations and resulting fines</b> Violation of data protection regulations can result in heavy fines.	Risik (OO)	✓	✓	✓

The Group's workforce was taken into account when determining the material impacts, risks, and opportunities and in the reporting as part of "ESRS 2 General Disclosures." The double materiality analysis (see IRO-1) identified the potentially affected own workforce, considering the activities, the working environment, and the characteristics of the workforce. No negative impacts on the Group's own workforce were identified due to transition plans to reduce

negative environmental impacts and to implement more environmentally friendly and climate-neutral activities. To date, Pankl Group's own workforce has not been considered in the transition plans (see also section E1-1). The Group employed a total of 4,154 people as of December 31, 2024. Further information on the workforce can be found in section "S1-6 Characteristics of the Company's Employees."



### MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

#### S1-1 POLICIES RELATED TO OWN WORKFORCE

##### Environmental and sustainability policy and sustainability guidelines

Pankl Group strives to create a working environment in which employees are optimally protected from health and injury risks through appropriate measures and processes. The environmental and sustainability policy and guidelines encompass the most important principles for occupational safety and the health protection of its employees. In addition, numerous instructions and safety training courses have been established to maintain high levels of safety and prevent accidents at work. The policy and guidelines are available on the Pankl Group website. The safety specialists or EHS teams at the respective locations or across all locations are responsible for the targeted development of occupational safety and health promotion for employees. They are supported by specialist occupational health service providers. At the highest level, the management boards or managing directors are responsible for the implementation of the guidelines. (IRO 14, 15)



### Guidelines for using the whistleblower system

The Whistleblower Policy serves to structure the process and protects whistleblowers when reporting within the whistleblower system. The policy defines the reporting process as well as information on confidentiality and data protection. The policy is prepared by the legal departments of the subsidiaries and updated as needed. The responsible managers and ultimately the management boards or senior management are responsible for its implementation. (IRO 13, 16, 17, 18, 19)

### Declaration of principles on respect for human rights

Pankl Group has published a policy statement, which is available on the Group's website. It underscores the company's commitment to compliance with all relevant laws and guidelines, particularly in the area of human rights. The policy statement is jointly prepared by the legal departments of the two operating companies – Pankl Racing and SHW – and updated as needed. The responsible managers and ultimately the management boards or senior management are responsible for its implementation. (IRO 13, 16)

### Code of Conduct

The Group's Code of Conduct forms the basis for a responsible and ethical corporate culture that is binding for all employees, managers, board members, and external contractors. It describes, among other things, principles relating to human rights, diversity, fair working conditions, occupational health and safety, forced and compulsory labor, child labor, and human trafficking. The subsidiaries and their business partners are committed to complying with applicable national and international laws, ordinances, and regulations, as well as the OECD Guidelines and the ILO Core Labor Standards. Further information on the Code of Conduct (such as its availability and relevant responsibilities) can be found in Section G1-1. (IRO 13, 14, 15, 16, 17, 18, 19)

### Information security framework directive

The internal information security policies of Pankl Racing and SHW protect information by ensuring confidentiality, availability, and integrity and are based on the requirements of ISO 27001. The policies apply to all employees of Pankl Group, as well as to affiliated units and third parties who work with corresponding information systems, as well as to all systems connected to the networks (e.g., mobile and network devices). The policies serve as a framework for ensuring information security within the Group. Information security is an essential part of data protection. They ensure that legal and contractual requirements are met and risks are minimized.



Data protection is maintained through the responsible handling of personal data and the principles of data minimization, as well as regular deletion after the purpose has been achieved. Security and awareness are strengthened through targeted measures to ensure a high level of security. The Information Security Department is responsible for the implementation of these policies. (IRO 18, 19)

### Information security and data protection policy

The information security and data protection policy applies internally and externally to the entire Pankl Group and applies to all employees. Information is protected from unauthorized access, loss, and manipulation. Compliance with legal and contractual requirements is ensured. Security risks are identified and minimized, while awareness of security measures is promoted. The responsible handling of personal data and its economical use are also a focus. The Information Security Department is responsible for the implementation of this policy. (IRO 18, 19)

### S1-2 PROCESSES FOR ENGAGING WITH OWN WORKERS AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

In Pankl Group, 76.7% of the entire workforce is represented by works councils. They are included in the decision-making process regarding far-reaching personnel-related developments. Employees can approach the works councils with their concerns at any time and receive advice and representation from them. At Pankl Group locations where there are no works councils, the Human Resources department and HR business partners act as the contact point for employees. Employees can also address their concerns to their managers, company doctors, the HR or legal department, and safety experts at any time, or communicate via the whistleblower system. In addition, annual employee reviews are held among white-collar employees, which serve as a structured exchange between employees and managers. These reviews are coordinated by the Human Resources department. Further information on employee reviews can be found in Section S1-13. 83.34% of the Group's employees are covered by collective agreements or have contracts with terms similar to those of collective agreements. These regulate the rights and obligations of employers and employees within the framework of the employment relationship.

### S1-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS

The Group strives to avoid negative impacts on its own employees. Corresponding measures are described in section ESRS S1-4. Furthermore, employees can address concerns at any time, for example, to their line managers, the works council, company doctors, the human resources or legal department, safety specialists, and HR business partners, or communicate them via the whistleblower systems. Information on these reporting options, such as the whistleblower system guidelines or specific contact addresses, has been published on the intranet. Specific reference has been made to the whistleblower systems in employee information (intranet, Pankl Formula, notice boards) and in the Compliance & Code of Conduct e-learning course, which is intended to contribute to internal awareness of the systems. Furthermore, the Code of Conduct, which refers to the whistleblower system, is communicated to all employees upon signing their contract, and reference is made to it whenever the content of the Code of Conduct changes. The protection of whistleblowers is firmly anchored in the company's principles. Complaints are processed and followed up according to priority depending on the type of report and the

reporting channel. The Legal Department monitors incoming reports to the whistleblower system, ensuring the effectiveness of the systems. Further information on the whistleblower system, including the follow-up process by the Legal Departments or, if necessary, external experts, can be found in sections G1-1 and G1-3.

### 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 measures relating to working conditions and employee satisfaction, occupational health and safety, training and continuing education opportunities, and diversity and equal opportunities were identified and implemented by the subsidiaries' human resources departments. When identifying measures, internal experts consider both legal requirements and the requirements and advice of the specialist departments. Data protection measures are identified and managed by the legal department / compliance contact point, while IT is responsible for data security measures. The responsible departments are also responsible for monitoring the effectiveness of the measures. This takes place, for example, in the form of knowledge assessments at the end of training courses or, in the case of cybersecurity measures, by evaluating fake phishing emails. After completing system-based training courses, employees have the opportunity to evaluate the training in terms of content and methods as well as practical relevance. This serves to monitor the effectiveness of the training. A high rating for practical relevance indicates that the training courses are well applicable to the employees' everyday work. Furthermore, the annual staff appraisals serve as an opportunity for feedback. Material, financial, and human resources were allocated to the management of the key IROs so that the aforementioned measures could be initiated or implemented.



## MEASURES RELATING TO WORKING CONDITIONS AND EMPLOYEE SATISFACTION

The Group sees itself as having a special responsibility to its employees. A focus is placed on fair and employee-friendly working conditions. These measures are managed, tracked, and monitored by the human resources departments of the subsidiaries. Employees can always contact the respective human resources department with suggestions for improvement. (IRO 13, 15)

- **Feedback mechanism:** An open-door policy is actively practiced throughout the Pankl Group to address concerns early on. In California, the Human Resources department conducted an internal leadership training based on Dale Carnegie principles in 2024 (California location) and will continue to offer it until 2025. Regular co-ordination meetings, suggestions for improvement, and employee surveys were conducted.
- **Improvement of the meal allowance:** At the Pankl Group's locations in California and China, the previous meal allowance was replaced by weekly on-site catering in 2024. The previous allowance was only used by about 25% of the workforce, while the new catering offer is used by significantly more employees.
- **Health insurance:** In China, additional health insurance has been provided for long-term employees of the Pankl Group since 2020, as well as regular health checkups for all employees. Team-building activities were conducted to reduce stress and promote physical and mental well-being.
- **Digitalization:** In 2024, the focus in Austria was on the data protection-compliant integration of AI into some HR processes. In the area of internal HR communications, a "Virtual HR Assistant" was rolled out to easily answer internal inquiries about specific regulations or documents. This tool consolidates all current guidelines and information of Pankl Group and can retrieve them in seconds and present them in an understandable manner.

## MEASURES TO PROMOTE OCCUPATIONAL SAFETY & HEALTH PROTECTION (IRO 16, 17)

In addition to the standardized measures for employee safety and health (these are summarized in the published occupational health and safety guidelines of the sub-groups, see Section S1-1), the following measures were implemented in the subsidiaries in fiscal year 2024. (IRO 13, 14)

The Group has set itself the goal of achieving a high level of occupational safety performance at all locations and in all business areas.

An essential component of occupational safety measures is the regular safety review of workplaces and processes, which also serves to monitor and track actions. Improvement measures are implemented as needed. In addition to regular investigations, case-specific analyses of accidents and near-misses are conducted to ensure continued workplace safety.

Pankl Group is also implementing further targeted measures to promote health and occupational safety. To support mental health, employees have access

to various mental health services, such as confidential counseling sessions, workshops, and stress management programs.

In addition, there is a campaign on the correct use of personal protective equipment (PPE), supported by training and information materials. Compliance with PPE requirements is regularly monitored by safety representatives. In addition, since 2022, the "Safety Walk & Talk" has been conducted quarterly. Managers and safety experts inspect work areas to address topics such as PPE, ergonomics, order, and psychological stress in the workplace. If a need is identified, Pankl Group supports the provision of suitable work equipment.

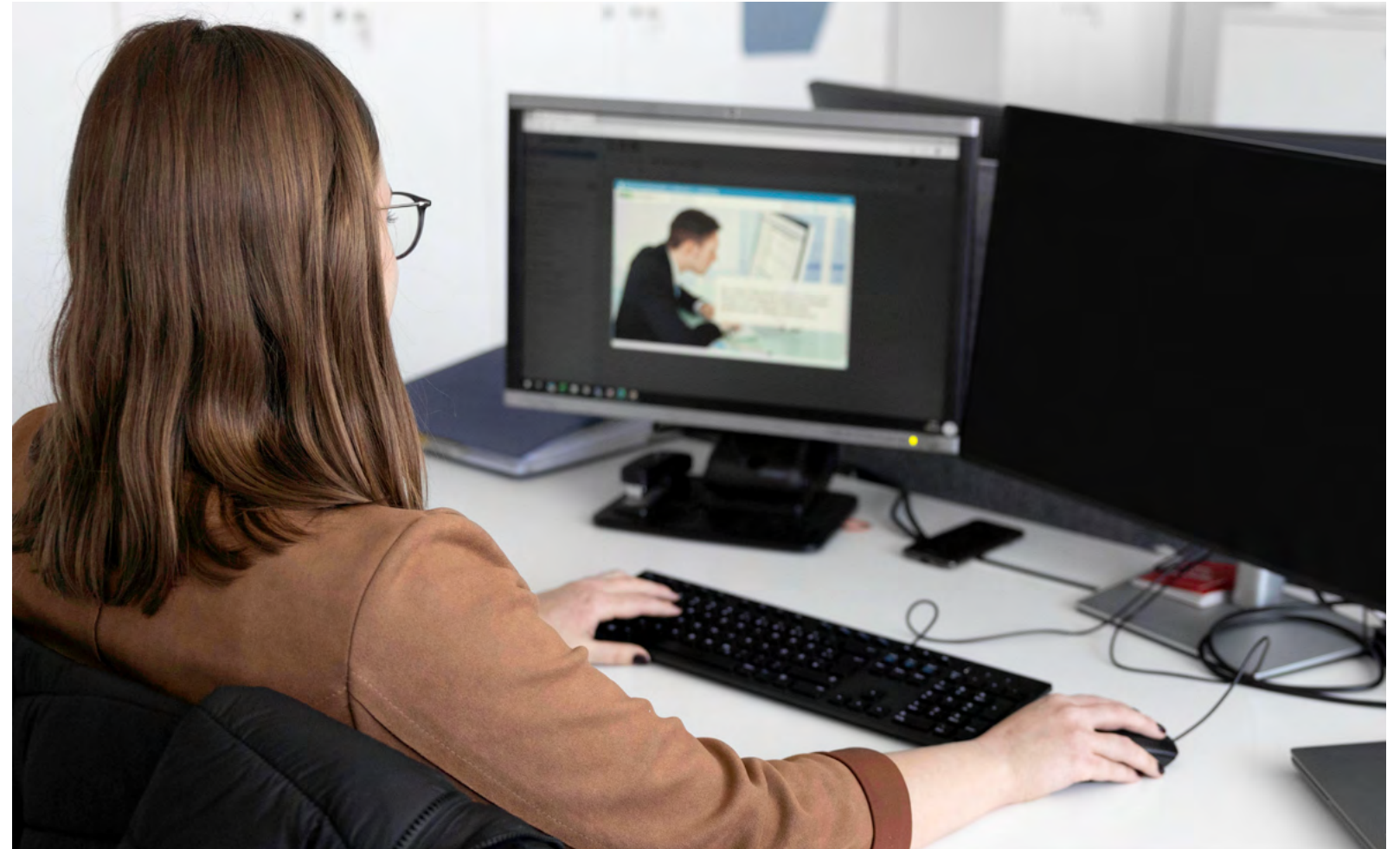
- **First Aid and CPR training:** About 40% of the Pankl Group's employees at the California site voluntarily obtained CPR and first aid certification in 2024. The certification is valid for two years.
- **Workplace Violence Prevention Program (WVPP):** In California, measures were introduced and implemented in accordance with Cal/OSHA (California Division of Occupational Safety and Health) guidelines to identify and prevent potential risks of violence in the workplace.
- **AUVA Seal of Quality:** The AUVA Seal of Quality recognizes companies for outstanding occupational safety and health protection. Requirements include systematic safety management, regular training, and preventive health measures. The Austrian sites of the Pankl Group underwent an external AUVA audit in 2024, which examined all relevant aspects.
- **Safety Coach for Girls:** This program supports female apprentices in the Pankl Group in Austria with safety and health issues. As a confidential contact point, we work closely with line managers, safety officers, occupational health professionals, and the works council. Direct communication promotes safety awareness, identifies improvements, and enables rapid action. Workshops and collaboration with the AUVA (Association of Occupational Safety and Health) ensure high standards.
- **Safety on Job Face-to-Face Training:** Personal on-site training is required by law and an integral part of occupational safety within the Pankl Group. This process was revised and further optimized in 2024. Training promotes workplace safety through direct communication between line managers and employees. It combines digital learning units in the e-learning portal with personal on-site training to adapt safety-related topics to the individual work environment.
- **Machine audits:** In 2024, a daily machine audit was introduced at the Pankl site in Aalen. Approximately 25 employees from various departments conduct audits on various systems following an automated selection process. The focus is on occupational safety, environmental protection, and quality. The results are documented, identified deficiencies are provided with appropriate measures and forwarded to the responsible departments for implementation.



## TRAINING & FURTHER EDUCATION OPPORTUNITIES

The Group pursues the approach of promoting internal career paths and lifelong learning through continuing education opportunities. These measures are managed, tracked, and monitored by the Pankl Academy team. Employees can always contact the teams with questions or suggestions for improvement. In the 2024 fiscal year, the following new offerings were implemented in the core subsidiaries. (IRO 13, 15))

- **eCademy:** With the introduction of a new e-learning tool in 2023, Pankl Group is focusing on digital learning. The e-learning tool was further rolled out at the Köflach, Slovakia, and Germany locations in 2024. Additional locations will follow in 2025. The eCademy offers important online training on safety and quality topics, which must be completed regularly. Employees can learn flexibly and from any location, enabling cost-effectiveness and easy tracking of progress. Interactive content and quizzes promote a sustainable learning process, which is required for audits and certifications.
- **Leadership development:** The Strategic Leadership Program (SLP) was continued in 2024 and supplemented by the International Leadership Program (ILP). Fifteen managers from international locations spent a week together under the motto "Together we lead" to acquire leadership skills and apply them in their work. The Human Resources department at the California location launched an internal leadership training program for directors to ensure long-term application of the principles learned in the 2023 Dale Carnegie training. The program will continue until 2025.
- **Introduction of a training evaluation system:** An evaluation of training effects and continuous optimization of training methods based on the results to ensure effectiveness was introduced in China.
- **Pankl Academy training catalog:** The sixth edition of the Pankl Academy Training Catalog 2024/2025 was published in Austria and includes both proven and new training courses, particularly on AI and digitalization. This demonstrates the Pankl Group's commitment to offering its employees relevant training opportunities and adapting to the challenges of the modern working world.
- **Promotion of apprentices in Pankl Group**
  - **International internship opportunities:** Collaboration with CIEE (Council on International Education Exchange) to promote international internships to expand technical skills, process improvements, and intercultural knowledge.
  - **Step-by-step training programs for machining technicians:** At the California site, apprentices are recruited from a local university of applied sciences for manufacturing technology. The training program was individually adapted to align the apprentices' skills with the Pankl Aerospace Systems Skill & Competency Matrix.
  - A dedicated **safety representative** (SVP) for apprentice safety matters has been appointed since 2024. The topic of "safety at work" is managed by a contact person responsible for all apprentices.
  - As part of its **apprenticeship development program**, the Pankl Group organizes internships abroad. These internships enable apprentices to expand their skills and experience at SHW's German production sites and gain international professional experience.
  - **Open Apprenticeship Workshop Days 2024** attracted over 200 visitors: Young people and their parents were able to get to know the company, try out apprenticeships, and interact with the recruiting team, trainers, and apprentices.
  - **Poly Project:** Together with students from the Kapfenberg Polytechnic School, a miniature F1 car was created, including an illuminated podium. The apprentices were able to apply their skills and knowledge and explain the process to the students.



## MEASURES TO PROMOTE DIVERSITY AND EQUAL OPPORTUNITIES

The Group attaches particular importance to ensuring that all employees are treated fairly and respectfully. Social justice is to be promoted, while discrimination and inequality are to be combated and avoided. These measures are managed, tracked, and monitored by the Human Resources department. Employees can always contact the Human Resources department with questions or suggestions for improvement. (IRO 13, 16, 17)

- **Family-friendly company:** In 2024, Pankl Racing Systems AG received the state award for "Most Family-Friendly Employer in Styria with 101 or more employees." Childcare subsidies, guaranteed kindergarten places in the municipality of Kapfenberg for Pankl Racing employees, home office, flexible working hours, and individual parental leave models are just a few of the measures that demonstrate a family-friendly corporate policy.
- **HeyCare:** Since 2024, access to the "HeyCare" platform has been available at all SHW locations in Germany to help employees achieve a better work-life balance through flexible childcare options.
- **Equal pay:** Since 2022, the salary dashboard at Pankl's California location has ensured that all employees – regardless of gender, ethnicity, or other protected characteristics – receive equal pay for equal work. In 2024, it was supplemented with external market data and key performance indicators.
- **Grow & Shine:** In 2024, female employees in the Pankl Group were particularly encouraged to enroll in training and development programs addressing equal opportunities and female empowerment. The "Grow and Shine" event took place in October 2024, at which the company was represented by ten female colleagues.



## DATA PROTECTION MEASURES

Pankl Group consistently implements data minimization measures in various business areas and continuously works on improving applicant management. Through regular employee training, Pankl Group ensures that the measures defined in internal processes are effectively implemented in daily work and that all employees are aware of the importance of data protection. This combination of targeted measures and processes contributes significantly to preventing data breaches and strengthens the trust of employees and business partners in Pankl Group. (IRO 18, 19)

- **Data classification:** Mandatory labeling of data in emails and M365 documents has been implemented at the California site. Depending on the classification, encryption, warnings, or IT notifications can be triggered. This serves security, prevents data leaks, and ensures compliance with data protection regulations.
- **Training on handling "Controlled Unclassified Information" (CUI) according to the US Department of Defense:** Training on the 11 regulations for accessing, labeling, protecting, and destroying CUI, as well as on handling security incidents. Employees must achieve a minimum of 70% in the final test.
- **PII Protect:** A platform for training and reviewing personally identifiable information (PII) has been implemented at the California site. Employees must maintain an ESS score of 630. In addition to annual training, weekly micro-training videos are provided.
- **Data Protection Management System:** Pankl Group implemented a new data protection management system in the 2024 fiscal year. The management system serves, among other things, to comply with applicable data protection requirements and to document the data processing activities taking place within Pankl Group. To enable employees to work efficiently and optimize internal processes, special attention was paid to the system's user-friendliness during system implementation.

The data protection measures of the subsidiaries were implemented preventively to ensure high standards in the handling of personal data. To date, no cases have been known in which individuals' right to data protection has been significantly compromised. The introduction of mandatory e-learning and the regular updating of the guidelines therefore serve to proactively prevent such cases. (IRO 21, 22)



## CYBERSECURITY MEASURES

The Group addresses IT and cyber risks through the continuous development of security measures, the use of state-of-the-art technologies, and a multi-level security concept. (IRO 18, 19)

- **TISAX Certification:** In addition, the Pankl sites in Kapfenberg, Bruck upon Mur, and Slovakia were certified according to TISAX (Trusted Information Security Assessment Exchange) requirements in the 2024 fiscal year. The certification is valid for three years and demonstrates the Group's high IT security standards, addressing awareness and management of confidentiality, availability, and integrity risks at the sites. TISAX was also successfully re-certified in Kunshan, China.
- **NIS2 Directive:** The NIS2 Directive (Network and Information Security Directive 2) is an EU requirement to strengthen cybersecurity. It expands the existing requirements for risk management, incident reporting, and the protection of critical infrastructure. The goal is to ensure that all necessary measures are identified and implemented in compliance with the law by June 2025.
- **Awareness:** To strengthen employee security awareness, the Pankl Group conducted IT security awareness training in the 2024 fiscal year. A system for automated, individually tailored phishing exercises was implemented to test its effectiveness. Starting in 2025, employees will also have the option of reporting suspicious emails to the security team for review with just a click of a mouse.
- **Security Operation Center (SOC):** Since 2024, the Pankl Group's SOC team has been supported in vulnerability analysis by an automated penetration testing solution. Darknet monitoring has also been introduced to detect potential threats from leaks or unauthorized activities at an early stage. In addition, internal solutions for analyzing and defending against cyberattacks have been established.
- **Penetration testing:** Pankl Group's SOC team in Austria or external companies at other locations regularly conduct comprehensive penetration tests to identify vulnerabilities and their exploitability. In addition, external penetration tests were conducted by independent partners to validate the results of the internal tests. Furthermore, a process for continuous monitoring of physical security was introduced in the 2024 fiscal year.
- **Disaster recovery:** In the first quarter of 2024, an emergency exercise was conducted to restore the MES system at the Pankl site in Tuttlingen. Such exercises are conducted annually to test the disaster recovery plan and gain valuable insights for emergencies. In addition, backup integrity is regularly checked by restoring individual directories, files, and entire servers.





## KEY RATIOS AND TARGETS

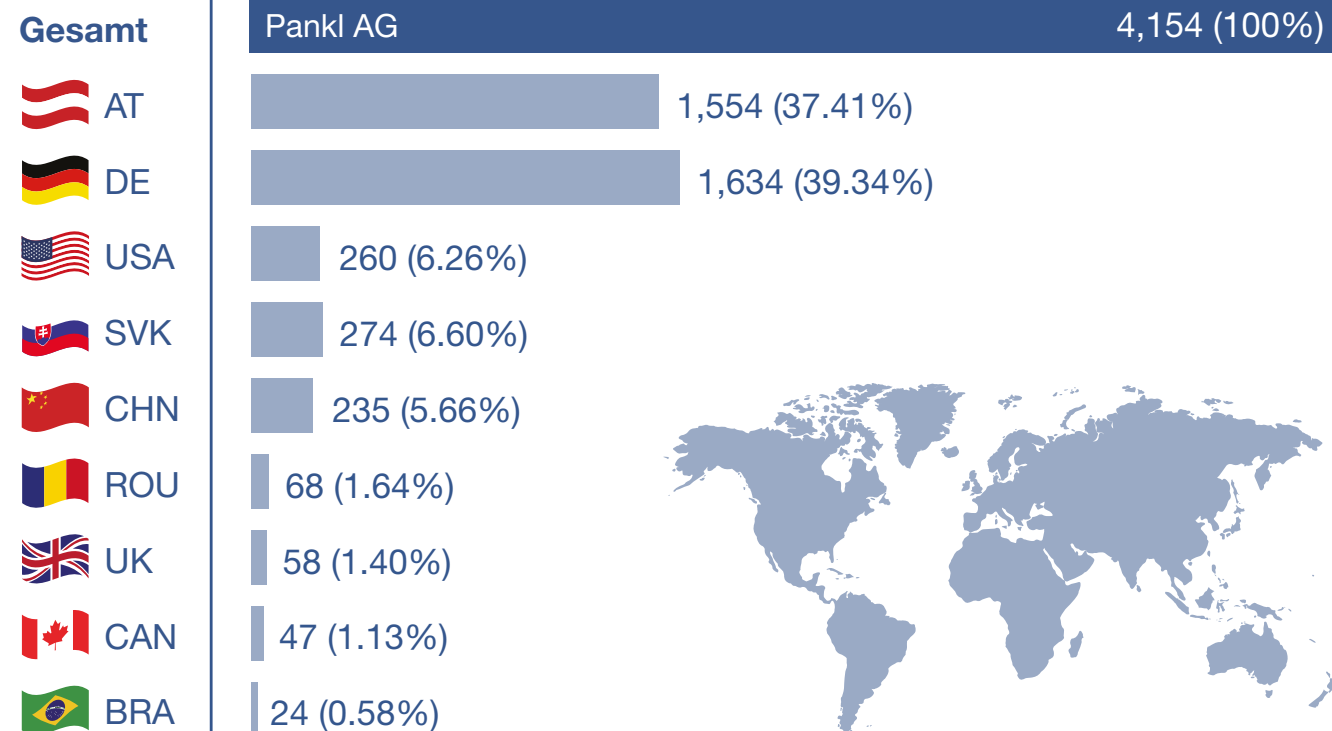
## S1-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

No objectives have yet been defined regarding the IROs related to the Group's workforce. The effectiveness of the concepts and measures related to the key IROs is monitored individually by the responsible departments. Examples of monitoring measures can be found in Section S1-4. However, there is currently no overarching procedure for monitoring effectiveness.

## S1-6 CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

As of 31 December 2024, Pankl Group employed 4,154 people, including 3,530 in Europe. In the 2024 fiscal year, the Group employed an average of 4,127 people. A total of 515 employees left the Group during the fiscal year. This corresponds to a fluctuation rate of 12.5%.

## ESRS S1-6 50 A



ESRS S1-6 50 A Country	Pankl Racing	
	Number of employees [headcount]	Share of total workforce [%]
Austria	1,550	67.69
Germany	30	1.31
USA	260	11.35
Slovakia	274	11.97
China	118	5.15
Romania	0	0.00
United Kingdom	58	2.53
Canada	0	0.00
Brazil	0	0.00
<b>Total</b>	<b>2,290</b>	<b>100</b>



ESRS S1-6 50 A Country	SHW	
	Number of employees [headcount]	Share of total workforce [%]
Austria	0	0.00
Germany	1,604	86.24
USA	0	0.00
Slovakia	0	0.00
China	117	6.29
Romania	68	3.66
United Kingdom	0	0.00
Canada	47	2.53
Brazil	24	1.29
<b>Total</b>	<b>1,860</b>	<b>100</b>

ESRS S1-6 50 A Employees by gender [headcount]	Pankl AG	Pankl Racing	SHW
Male	3,177	1,616	1,557
Female	977	674	303
Diverse	0	0	0
Not specified	0	0	0
<b>Total number of employees</b>	<b>4,154</b>	<b>2,290</b>	<b>1,860</b>



ESRS S1-6 50 B 2024 [Headcount]		Number of employees	Number of employees with permanent employment contracts	Number of employees with fixed-term contracts	Number of on-call staff
Pankl AG	Male	3.177	2.980	197	0
	Female	977	951	26	0
	Diverse	0	0	0	0
	Not specified	0	0	0	0
	<b>Total</b>	4.154	3.931	223	0
Pankl Racing	Male	1.616	1.612	4	0
	Female	647	647	0	0
	Diverse	0	0	0	0
	Not specified	0	0	0	0
	<b>Total</b>	2.290	2.286	4	0
SHW	Male	1.557	1.364	193	0
	Female	303	277	26	0
	Diverse	0	0	0	0
	Not specified	0	0	0	0
	<b>Total</b>	1.860	1.641	219	0

## S1-9 DIVERSITY METRICS

ESRS S1-9 64 A 2024	Pankl AG	Pankl Racing	SHW
Male – Number of employees in management positions [headcount]	181	113	68
Male – Share of employees in management positions [%]	0.83	0.82	0.86
Female – Number of employees in management positions [headcount]	36	25	11
Female – Share of employees in management positions [%]	0.17	0.18	0.14
Diverse – Number of employees in management positions [headcount]	0	0	0
Diverse – Share of employees in management positions [%]	0	0	0
Not specified – Number of employees in management positions [headcount]	0	0	0
Not specified – Share of employees in management positions [%]	0	0	0
<b>Total – Number of employees in management positions [headcount]</b>	<b>217</b>	<b>138</b>	<b>79</b>

ESRS S1-9 64 B Age groups 2024	Pankl AG	Pankl Racing	SHW
< 30 years – Number of employees [headcount]	971	639	332
< 30 years – Share of employees [%]	23.38	27.9	17.85
30 – 50 years – Number of employees [headcount]	2,232	1,218	1,012
30 – 50 years – Share of employees [%]	53.73	53.19	54.41
> 50 years – Number of employees [headcount]	951	433	516
> 50 years – Share of employees [%]	22.89	18.91	27.74

ESRS S1-13 83 A Performance and career development evaluation 2024	Pankl AG	Pankl Racing	SHW
Male – Number of employees with regular performance and career development evaluation [headcount]	2,004	907	1,095
Male – Share of employees with regular performance and career development evaluation [%]	72.95	63.56	83.08
Female – Number of employees with regular performance and career evaluation [headcount]	743	520	223
Female – Share of employees with regular performance and career development evaluation [%]	27.05	36.44	16.92
Diverse – Number of employees with regular performance and career development evaluation [headcount]	0	0	0
Diverse – Share of employees with regular performance and career development evaluation [%]	0	0	0
Not specified – Number of employees with regular performance and career development evaluation [headcount]	0	0	0
Not specified – Share of employees with regular performance and career development evaluation [%]	0	0	0
<b>Total – Number of employees with regular performance and career development evaluation [headcount]</b>	<b>2,747</b>	<b>1,427</b>	<b>1,318</b>

ESRS S1-13 83 B Average number of training hours per year in 2024 [hours]	Pankl AG	Pankl Racing	SHW
Male	17.89	18.69	17.10
Female	15.82	18.61	9.62
Diverse	0	0	0
Not specified	0	0	0
<b>Total</b>	<b>33.71</b>	<b>37.30</b>	<b>26.72</b>

COMPANY SPECIFIC DISCLOSURES Training ratios regarding data protection in 2024	Pankl AG	Pankl Racing	SHW
Persons trained online in data protection - Number of employees trained in data protection [headcount]	2,704	2,095	609
Persons trained online in data protection – Share of employees trained in data protection [%]	65.09	91.48	32.74
Of which management – Number of employees trained in data protection [headcount]	214	0	0
Of which other staff – Number of employees trained in data protection [headcount]	2,490	0	0
Persons trained in data protection on-site - Number of employees trained in data protection [headcount]	0	0	0
<b>Total – Number of employees trained in data protection [headcount]</b>	<b>2,704</b>	<b>0</b>	<b>0</b>

## S1-14 HEALTH AND SAFETY METRICS

As of 31 December 2024, 71.3% of the Group's employees were covered by a health and safety management system.

ESRS S1-9 88 B-D Reportable work accidents in 2024 [number]	Pankl AG	Pankl Racing	SHW
Deaths due to work-related injuries	0	0	0
Deaths due to work-related illnesses	0	0	0
Reportable work-related illnesses	0	0	0
Reportable work-related injuries	74	60	14
Rate of reportable accidents at work [reportable accidents / 1m working hours]	9.47	13.62	4.05

ESRS S1-14 88 E Work days lost in 2024 [number]	Pankl AG	Pankl Racing	SHW
Work-related days lost by reason	0	0	0
Reason 1: Work-related injuries due to work accidents	2,375	627	1748
Reason 2: Deaths due to work accidents	0	0	0
Reason 3: Work-related illnesses	0	0	0
Reason 4: Deaths due to work-related illnesses	0	0	0
<b>Total</b>	<b>2,375</b>	<b>627</b>	<b>1,748</b>



## S1-16 COMPENSATION METRICS (PAY GAP AND TOTAL COMPENSATION)

ESRS S1-16 97 A-B Compensation ratios in 2024	Pankl AG	Pankl Racing	SHW
Gender pay gap [%]	32.56	26.08	38.15
Ratio of the total annual compensation of the highest-paid individual to the median total annual compensation of all employees [ratio]	17.79:1		

The gender pay gap, defined as the difference between the average wage level of female and male workers, expressed as a percentage of the average wage level of male workers, amounts to 32.56%. This can largely be explained by positions within the group and part-time arrangements.

The ratio of the total annual compensation of the highest-paid individual to the median total annual compensation of all employees (excluding the highest-paid individual) is 17.79:1.

## S1-17 INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

ESRS S1-17 102-104 Incidents relating to human rights in 2024	Pankl AG	Pankl Racing	SHW
Total number of cases of discrimination, including harassment, reported during the reporting period [number]	2	0	2
Number of complaints submitted through channels and, where applicable, OECD National Contact Points for Multinational Enterprises [number]	0	0	0
Total amount of significant fines, sanctions and damages related to the described incidents and complaints of discrimination [€]	0	0	0
Number of serious human rights cases [number]	0	0	0
Total amount of significant fines, sanctions and damages related to serious human rights cases [€]	0	0	0

## VALUATION PRINCIPLES AND ASSUMPTIONS







ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
General information on the quantitative data points regarding employees			Unless otherwise stated, the analyses were performed from the subsidiaries' ERP systems. The data from all companies was consolidated manually. Further information can be found in the following lines. With the exception of the fluctuation rate, all information and calculations are based on data as of 31 December 2024.
S1-6	50a	Employees by gender and country	So far, no employee has indicated their gender as "diverse." This option is available globally. Gender was recorded for all employees, which is why the option "not specified" was marked as irrelevant. Data from subsidiaries was manually added to the headcount.
S1-6	50b	Employees by type of contract	Fixed-term employment contracts were concluded with freelancers, interns, holiday workers, and temporary agency workers. All other employees had permanent employment contracts. The Group does not employ any on-call workers (defined as employees without guaranteed minimum working hours). Data from subsidiaries was manually added to the headcount.
S1-6	50c	Employee fluctuation	The definition of fluctuation includes natural jobs turnover. Departures due to the expiration of fixed-term employment contracts were not taken into account. The employee fluctuation rate was calculated based on the average number of employees in the 2024 fiscal year.
S1-9	66a	Gender distribution in management levels	The definition of management includes management board members, managing directors, and department heads. Data from subsidiaries were manually added to the headcount.
S1-9	66b	Distribution of employees by age group	See general information on the quantitative data points regarding the Group's employees. Data from subsidiaries were manually added to the headcount.
S1-13	83b	Training hours per employee	Successfully completed data protection training courses are monitored online through the e-learning system. To calculate the average training hours per employee by gender, the total number of training hours per gender was summed and divided by the gender-specific headcount.
Company specific disclosures		Training figures regarding data protection	Successful completion of data protection training courses is monitored online through the sub-groups' e-learning systems. The system sends invitations to all employees.
S1-14	88a	Health and Safety Management	SHW has a management system for occupational health and safety at its German locations. The Austrian locations adopt this management system. All employees at the included locations are covered by this management system.

ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
S1-14	88b, d, e	Occupational safety indicators	Pankl Group's key performance indicators are recorded via an intranet report. Data for the international subsidiaries was requested, and the total number was reported. The number of working hours for the rate of reportable work accidents was recorded using the ERP system.
S1-14	88c	Rate of reportable work accidents	Pankl Group's key figures are recorded via an intranet report. Data for the international companies was requested, and the total number was reported. To calculate the rate of reportable work accidents, the number of reportable work accidents was divided by the total number of hours worked by the workforce and multiplied by 1,000,000.
S1-16	97a	Gender pay gap	To determine Pankl Group's gender pay gap, the salaries, including all special payments, and the actual hours worked (actual hours) of all male and female employees with active employment as of 31 December 2024, were evaluated for the entire calendar year 2024. The gender pay gap was calculated using the following formula: (Average gross hourly earnings for men - Average gross hourly earnings for women) / Average gross hourly earnings for men. For the Austrian locations, the raw data was evaluated directly using the payroll software. For locations outside Austria, extracts from the location-specific ERP systems of salaries and actual hours were used. This results in a gender pay gap of 32.56% for Pankl Group
S1-16	97b	Pay gap between all employees and the highest paid person	To determine the pay gap within the Pankl Group, all employees with active employment as of 31 December 2024, were considered, with the analysis covering the entire calendar year 2024. For the Austrian locations, the data on salaries, including all special payments, was evaluated directly using the Sage DPW payroll software. At the international locations, the corresponding data on salaries, including special payments, was taken from the location-specific ERP systems. The individual total annual compensation of the entire Pankl Group was aggregated, and the median value was calculated. This value was then compared to the total compensation of the highest-paid individual. The ratio of the total annual compensation of the highest-paid individual to the median of the total annual compensation of all employees (excluding the highest-paid individual) was 17.79:1.
S1-17	103 a-d, 104 a, b	Cases of discrimination and serious human rights incidents	The legal departments monitor the discrimination reporting systems and the monitoring of serious human rights cases. The reasons given for the three discrimination incidents mentioned were discrimination based on ethnic origin in two cases and harassment in one case.

# ESRS S2 VALUE CHAIN WORKERS

## STRATEGY

### ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Topic	IRO	Major impacts, risks or opportunities	Time horizon			
			Short-term	Medium-term	Langfristig	
Working conditions	20	<b>Potentially poor working conditions in certain upstream value chain sectors</b> There may be occupational safety and health deficiencies, discrimination / inequality, and / or inadequate pay in certain upstream value chain sectors. (Systemic)	Negative (VC)			
Other work-related rights	21	<b>Potential occurrence of forced labor and child labor in certain upstream value chain sectors</b> Forced labor and/or child labor may occur in certain upstream value chain sectors.	Negative (VC)			

The identified negative impacts are impacts that could potentially occur in the upstream value chain of Pankl Group. They were identified in the course of a Value Chain Risk Analysis (further information can be found in Section S2-4).

## MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

### S2-1 POLICIES RELATED TO VALUE CHAIN WORKERS

#### Declaration of principles on compliance with human rights

In order to ensure the most comprehensive protection of individual rights, Pankl Group has published a Declaration of Principles, which, like the Whistleblower Policy, is available on Pankl Group's website. It underscores the company's commitment to compliance with all relevant laws and guidelines, particularly in the area of human rights. The relevant managers and ultimately the management boards or senior management are responsible for their implementation. (IRO 20, 21)

#### Guidelines on the whistleblower system

Pankl Group has established a global whistleblower system (see Section G1-1 for information on the content of the internal policy, its scope, responsibilities, and availability) that is accessible to employees and third parties. Workers in the value chain can contact the whistleblower system at any time. (IRO 21)

### Codes of Conduct

The Code of Conduct is a central document regulating conduct within Pankl Group and its business partners – including the group's suppliers – and prohibits any form of child or forced labor. It describes, among other things, principles relating to human rights, respect, integrity, health protection, and occupational safety. Pankl Group and its business partners are committed to complying with applicable national and international laws, ordinances, and regulations, as well as the ILO core labor standards (in particular ILO C138 on the minimum age for admission to employment, ILO 182 on the prohibition and immediate action for the elimination of the worst forms of child labor, ILO 29 on forced or compulsory labor, and ILO 105 on the abolition of forced labor). Further information on the Codes of Conduct (such as their availability, scope of application, responsibilities, and references to international standards and guidelines) can be found in Section G1-1.

Should violations of the respective Code of Conduct or the respective Declaration on Modern Slavery and Human Trafficking occur despite the preventive measures, the Group will initiate appropriate measures. The central goal is to correct and prevent violations and to actively and effectively improve the sustainability performance of business partners. In serious cases or if the measures are refused, the Group reserves the right to terminate the current business relationship. In fiscal year 2024, no cases of non-compliance with the Codes of Conduct were reported in the upstream and downstream supply chain. Further measures regarding the rights and working conditions of workers in the upstream and downstream value chain can be found in Section S2-3. (IRO 20, 21)

### S2-2 PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

The Group currently has no process for involving value chain workers regarding impacts. Potential impacts in the value chain were identified using the Value Chain Risk Analysis (see S2-4 for further information), which is considered an indirect involvement of value chain workers. Furthermore, value chain workers can contact the established whistleblowing system (see G1-1) at any time. All incoming reports are individually reviewed, and follow-up actions are initiated as needed.

### S2-3 PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

Reporting options for workers in the value chain and other measures to promote the implementation of the Code of Conduct are described in detail in section G1-1. The reporting options are accessible to employees and third parties, including workers in the value chain. The follow-up of raised and reported problems is also described in detail in section G1-1 and is co-ordinated by the legal departments of the subsidiaries. The whistleblower system guidelines described in G1-1 define rules to protect whistleblowers. There are currently no procedures to promote the availability of the procedures in the workplace for workers in the value chain. To date, workers in the value chain have not been explicitly involved in the implementation of the reporting channels.

### S2-4 TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS

**Value Chain Risk Analysis:** Pankl Group prepared this analysis in the 2024 reporting year. In addition to the abstract risk, which is also based on publicly available indices and studies on industry and country risks, concrete risks are also taken into account, which were determined based on the purchasing and sales volume per country and, subsequently, on the country-specific risks within these countries. This analysis was conducted using a risk management tool that analyzes Tier 1 suppliers and customers, as well as the company's own business area. The country risk analysis also focuses on Pankl Group's direct upstream and downstream business partners. (IRO 20, 21)

The Group continuously monitors, evaluates, and improves its efforts to ensure it fulfills its human rights due diligence obligations. Its subsidiaries take reports received through the whistleblower systems seriously and follow them up. To date, no reports of violations have been received that have led to legally relevant compliance cases. The measures are identified and managed by internal experts in Purchasing, the Legal Department, and Quality Management. Should violations of the Code of Conduct or other relevant, agreed compliance guidelines occur despite the measures described, the companies reserve the right to implement appropriate measures.

These are described in S2-1. The Code of Conduct forms the framework for the economic activities of Pankl Group and its business partners and thus contributes to preventing negative impacts of the Group's activities on workers in the value chain. Material, financial, and human resources were allocated to the management of the key IROs so that the above-mentioned measures could be initiated or implemented.

### KEY RATIOS AND TARGETS

### S2-5 TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

To date, the subsidiaries have not set any targets regarding the IROs related to workers in the value chain. The effectiveness of the concepts and measures related to the key IROs is monitored individually by the responsible departments. However, there is currently no overarching process for monitoring effectiveness.

### Company specific disclosures

**Purchasing:** Pankl Group's purchasing volume in 2024 was approximately €400m for its locations in Austria and Germany. This figure encompasses the global supply chain. Half of Austria's purchasing volume originates from Austria. Overall, approximately 80% is sourced within Europe. The Pankl Group's analysis considered the likelihood of poor working conditions in the upstream value chain, based on the countries of origin of the primary materials and Tier 1 suppliers. Due to the high proportion of purchasing volume from Europe, the risk of poor working conditions, as well as child and forced labor, can be classified as low. (IRO 20, 21)



Reported cases of non-compliance with the Code of Conduct in the upstream and downstream value chains (ESRS S2-4 §36)

Data point	2024
Number of reported cases of non-compliance with the Code of Conduct in the upstream and downstream value chains	0
Number of reported cases of non-compliance with the Code of Conduct in the upstream and downstream value chains that have led to compliance-relevant cases	0



## VALUATION PRINCIPLES AND ASSUMPTIONS

ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
Geographical breakdown of purchasing volume (company specific disclosure)			The analysis is carried out using the subsidiaries' ERP systems. For Pankl Group, the total purchasing volume for Austria and Germany is reported.
Valuation of ESG risks of suppliers (company specific disclosure)			The basis for categorizing suppliers is the Value Chain Risk Analysis, taking into account both abstract and concrete risks. The analyses are performed in Excel.
ESRS S2-4	36	Reported cases of non-compliance with the Code of Conduct	Cases received through the whistleblower systems were evaluated. This system is monitored by the legal departments. The legal departments also serve as the contact for the national contact point in connection with the OECD Guidelines. In fiscal year 2024, no complaints were forwarded to the subsidiaries via the contact points.

# ESRS S4 CONSUMERS AND END-USERS

## MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

### S4-1 POLICIES RELATED TO CONSUMERS AND END-USERS

#### Quality policy

The quality policy of Pankl Racing Systems AG is anchored in the company's mission statement and publicly accessible on the company website. Pankl Aerospace Systems Europe GmbH, a Pankl Racing Systems AG company, has its own independent quality policy geared to the specific requirements of the aerospace industry. At SHW AG, the quality policy is anchored in the applicable management manuals and thus integrated into the company's internal control and documentation systems. (IRO 25, 26, 28)

#### Code of Conduct

The Code of Conduct is the central document governing the conduct of the Group and its business partners. It describes, among other things, principles relating to human rights, respect, and integrity. In particular, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct and the ILO core labor standards (especially ILO C138 on Minimum Age for Admission to Employment, ILO 182 on the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, ILO 29 on Forced or Compulsory Labor, and ILO 105 on the Abolition of Forced Labor) apply. The subsidiaries and their business partners do not condone any violation of human rights. Further information on the Code of Conduct (such as its availability, scope, and relevant responsibilities) can be found in Section G1-1. (ILO 25, 26, 27, 28, 29, 30)

The subsidiaries are not aware of any cases of non-compliance with the respective Code of Conduct and thus the international standards listed therein in the upstream and downstream value chain. Procedures for engaging consumers and end-users can be found in G1-1 and the SBM-3 sections of this Topic Standard and ESRS 2.



S4-4 TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

Product safety and quality in Pankl Group

Pankl Group places the highest value on product safety and quality, particularly due to the demanding requirements of the automotive and aerospace industries. To meet these demands, a highly sophisticated integrated management system has been established, which covers and monitors both industry-specific standard requirements and relevant customer and regulatory requirements. Key measures to ensure product safety include, above all, the company's extensive training and continuing education program for its employees, as well as the regular conduct of audits and requalification tests. Pankl operates state-of-the-art test benches where components are tested and validated under realistic conditions.

Furthermore, production-related testing and measurement methods according to the highest standards and ongoing statistical process control are used to guarantee the conformity and reliability of products and manufacturing processes. The Pankl Group's organizations are certified according to relevant management system standards, including ISO 9001, IATF 16949, AS/EN 9100, ISO 14001, and many other industry-specific standards. A total of around 65 certifications currently exist, whose compliance and effectiveness are regularly reviewed by customers, authorities, certification bodies, and internal departments. The Pankl Group's goal is to strengthen the trust of customers and end users through effective quality management and professional quality assurance and to guarantee product safety at the highest level. (IRO 25)

KEY RATIOS AND TARGETS

S4-5 TARGETS RELATED TO MANAGING MATERIAL IMPACTS ON CONSUMERS AND END-USERS

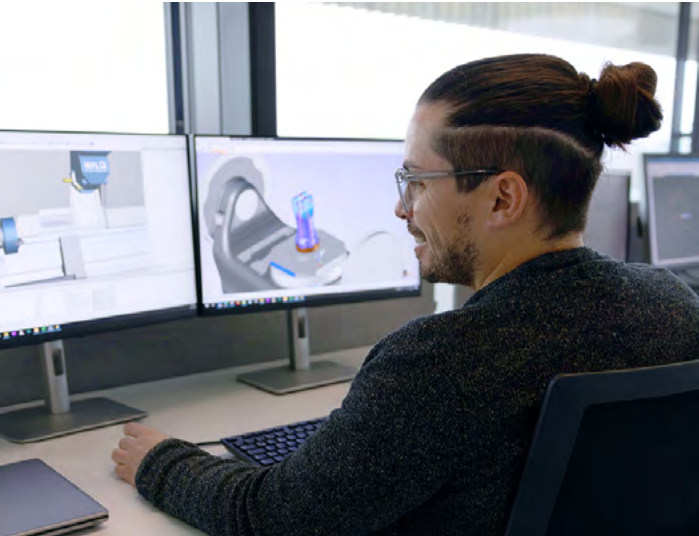
The subsidiaries have not yet set targets regarding significant impacts, risks, and opportunities related to consumers and end users. The effectiveness of the policies and measures related to the key IROs is monitored individually by the responsible departments. However, there is no overarching process for monitoring effectiveness yet.

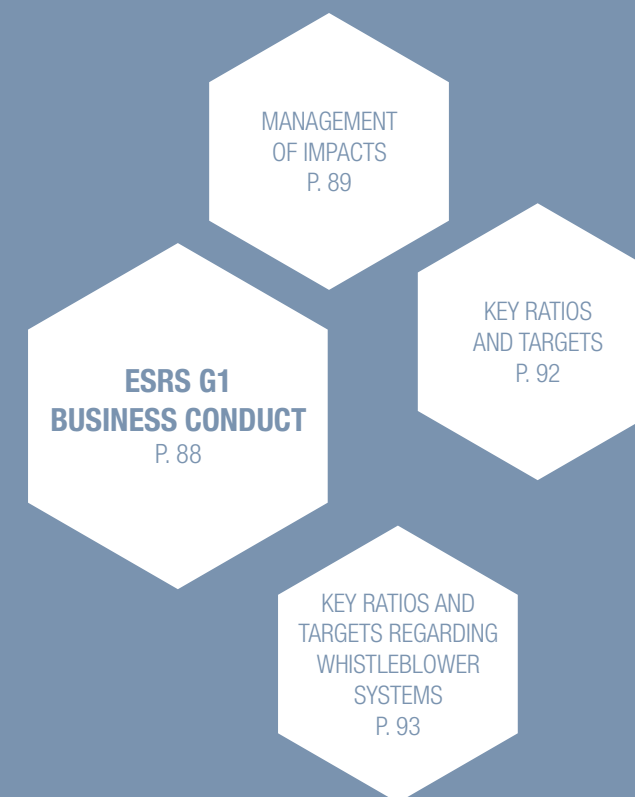
Company specific disclosures

**Recalls:** In the fiscal year 2024, 330 complaints were registered at Pankl Racing Systems AG. Based on the total number of products delivered, this corresponds to a complaint rate of 0.00339%. This extremely low rate is due to the consistent implementation of the company-wide safety and quality policy as described in S4-1. (IRO 25, 26)

VALUATION PRINCIPLES AND ASSUMPTIONS

ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
		Complaints (company specific disclosure)	Complaints are recorded and tracked decentrally at the respective Pankl Group locations. The consolidated evaluation of these complaints is compiled centrally as part of the management review.





# GOVERNANCE

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ESRS G1 BUSINESS CONDUCT

ESRS 2 SBM-3 MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH RE-SOURCE USE AND CIRCULAR ECONOMY

Topic	IRO	Major impacts, risks or opportunities		Time horizon		
				Short-term	Medium-term	Long-term
Corporate culture	22	<b>Promoting a responsible corporate culture</b> in collaboration with our own workforce and external business partners along the value chain.	Positive (OO, VC)	✓	✓	✓
Protection of Whistleblowers	23	<b>Strengthening trust and a sense of security through whistleblower protection</b> By enabling multiple, partly anonymous, reporting options and encouraging their use, the sub-groups strengthen whistleblowers' trust and sense of security.	Positive (OO, VC)	✓	✓	✓
Corruption and bribery	24	<b>Risk of financial losses due to corruption and bribery cases</b> Violations of anti-corruption and bribery regulations can lead to financial losses.	Risik (OO, VC)	✓	✓	✓

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

G1-1 BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

Code of Conduct

Pankl AG's Code of Conduct forms the basis for a responsible and ethical corporate culture. It applies to all employees, managers, and board members, as well as business partners. The Code of Conduct includes detailed guidelines for compliance with human rights, environmental protection, fair working conditions, and ethical business conduct. At the same time, it obligates employees to strictly adhere to international standards such as the OECD Guidelines, ILO Conventions, and conventions against child and forced labor. The Code of Conduct is permanently available in seven languages on the Group's website, making it transparent and easily accessible to all relevant stakeholders.

The Group strictly adheres to national and international anti-corruption guidelines and has established a clear zero-tolerance policy towards corruption and bribery in its Code of Conduct. This policy is supported by training for all employees and managers of Pankl Group. Certain functions, particularly senior positions with direct contact with external partners, are particularly exposed to the risk of corruption due to their decision-making authority. Corruption can begin with small, initially inconspicuous acts, which is why every function within the Group is potentially at risk. This underscores the necessity of group-wide awareness-raising.

To effectively identify and investigate concerns about potential violations of the Code of Conduct, a system of internal and external reporting channels has been established, including an anonymous whistleblower system. This allows employees and third parties to report violations securely, confidentially, and, if desired, anonymously. Whistleblower protection is firmly anchored in the company's principles, and sanctions against whistleblowers acting in good faith are excluded. In doing so, Pankl Group ensures compliance with national and international anti-corruption regulations (e.g., UNCAC, OECD Guidelines for Multinational Enterprises). See also further explanations in Section S1-3.

If violations of compliance guidelines are suspected, internal investigations are initiated immediately. These investigations are conducted independently by the legal departments and the compliance contact point of the subsidiaries, with support from external experts if necessary. As soon as a report is received, it is reviewed and subjected to an initial assessment by the legal departments and the compliance contact point. Specific steps are initiated on a case-by-case basis. First, relevant information is gathered and discussions are held with the individuals affected. If necessary, meetings are held with superiors, the human resources department, and / or external experts. These discussions serve to comprehensively clarify the matter and plan the necessary measures.

To ensure that all employees – regardless of their position or role – understand the company's ethical standards and implement them in their daily work, the Pankl Group has introduced an annual, mandatory e-learning program on the Code of Conduct. This e-learning program is continuously updated. It covers concrete examples of corruption and bribery to familiarize employees with practical scenarios and promote an understanding of potential risks. Furthermore, a policy has been developed that contains clear guidelines for behavior and recommended actions to prevent corruption and bribery (see Policy on Accepting Advantages and Gifts, G1-1). The contact details of the Legal Department are provided directly in the e-learning program, so that employees can receive individual advice from the Legal Department if they have specific questions or concerns

Appropriate measures are then taken, which can range from warnings to disciplinary action. Each measure is carefully co-ordinated with the relevant internal departments and consistently implemented. Further steps can also be derived from the reports, such as the creation of new guidelines by the legal departments and the compliance contact point to raise employee awareness. Managers are also required to take preventative measures to avoid hazards and ensure safe working methods. The Code of Conduct is regularly reviewed by the responsible legal departments and the compliance contact point and updated as necessary to ensure compliance with the high standards. Implementation of the Code of Conduct is ensured within the respective corporate group by the specialist departments, the responsible managers, and ultimately the management.



#### Guidelines for handling invitations and accepting gifts

Pankl Group has an internally available policy on the proper handling of invitations and the acceptance of benefits and gifts. To avoid conflicts of interest, clear and strict rules have been established for the extending and acceptance of invitations by employees of subsidiaries. The goal is to prevent bribery, corruption, and other criminal offenses. Business partners are also obligated to make decisions exclusively on an objective basis, as set forth in the Code of Conduct. The policy is drawn up by the legal departments of the subsidiaries and updated as needed. The relevant departments or managers, and ultimately the management boards or management, are responsible for promoting its implementation. (IRO 34)

Further information on the establishment, development and promotion of the internal corporate culture can be found in section S1-4, Measures relating to working conditions and employee satisfaction, and in section S1-4, Training and development opportunities.



#### G1-2 – MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

Pankl Group has defined standard purchasing conditions valid for its subsidiaries, which regulate the essential aspects of procurement, including payment terms and quality requirements. There is no differentiation based on the size of the suppliers. Additionally, individual agreements can be concluded with suppliers if required. To evaluate and monitor social and ecological sustainability performance within the supply chain, Pankl Group uses a Value Chain Risk Analysis, the methodology of which is explained in more detail in Section S2-4. One component is a standardized self-disclosure in which suppliers provide statements on relevant sustainability topics – particularly social and ecological aspects.

#### G1-3 PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

**Update of the Code of Conduct and associated guidelines:** The Code of Conduct, including the content on combating corruption and bribery, and associated guidelines were updated and revised in 2023 (for Pankl Group). Compliance with the Code of Conduct is mandatory for all employees and business partners. The "Code of Conduct" e-learning course must be completed annually by all employees and supports employees in its implementation. It is planned to revise and update the Code of Conduct and the associated e-learning course for Pankl Group in 2025 / 2026 to continue to meet current requirements. The updating of the guidelines, directives, and other online training courses will also continue in the future in order to be able to respond to changes in the environment of the respective sub-groups.

#### Guidelines for using the whistleblower system

Die Richtlinie für Hinweisgeber dient der Prozessstrukturierung und schützen den Hinweisgeber bei der Meldung im Rahmen des Hinweisgebersystems. In der Richtlinie sind der Meldeprozess sowie Informationen zu Geheimhaltung und Datenschutz festgeschrieben. Die Richtlinie wird von den Rechtsabteilungen der Tochtergesellschaften in Zusammenarbeit erstellt und bei Bedarf aktualisiert. Für deren Umsetzung sind die zuständigen Führungskräfte und letztlich der Vorstand oder die Geschäftsführung verantwortlich. (IRO 23)

G1-3	Pankl AG Own workforce (incl. management)
<b>Coverage through training</b>	
Total persons	4,154
Total trained persons	2,675
in %	64.4
<b>Training method and duration</b>	
Computer-based trainings	About 30 min
<b>Frequency</b>	
How often is training required?	Annually
<b>Topics covered</b>	
Definition of compliance	✓
Code of Conduct and corporate culture	✓
Human rights, respect and integrity, diversity, fair working conditions and sustainability	✓
Fair competition and antitrust prohibition	✓
Conflicts of interest, handling of company property and trade secrets, data protection	✓
Corruption and bribery, money laundering and terrorist financing, export control	✓
Influence of the Code of Conduct on business relationships	✓
Consequences of violating compliance regulations	✓

#### Measures to promote the whistleblower system:

Since the introduction of the reporting system, the Pankl Group has enabled internal and external whistleblowers to report via the system. This is accessible via the company website. The legal departments monitor and evaluate reported cases directly within the system to ensure efficient control and rapid processing.

Further information on the follow-up of reports and the publication of the associated guidelines can be found in Section G1-1. These measures are part of the ongoing efforts to further improve the prevention of corruption and bribery and to make the company's policies even more effective. Employee feedback received via the reporting channels provides insights into trust in the corporate culture and ethical business management.



KEY RATIOS AND TARGETS

Specific parameters have been defined to precisely assess the performance and effectiveness of measures in relation to key internal policies and guidelines. These enable detailed monitoring of progress, particularly in the areas of corporate culture, whistleblower protection, and the prevention of corruption and bribery. The defined key performance indicators and targets for the subsidiaries are directly

linked to the Code of Conduct and the associated guidelines and are intended to ensure a responsible corporate culture, the protection of whistleblowers, and the prevention of corruption and bribery. Regular audits and evaluations help ensure adherence to compliance guidelines. These validations increase the credibility and reliability of the data used to assess target achievement.

G1-4 CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY

In the fiscal year 2024, no violations of corruption and / or bribery regulations or other compliance cases were identified that would have resulted in legal proceedings. There were no cases that resulted in disciplinary consequences or even dismissal.

No contracts with business partners had to be terminated or not renewed due to violations. Furthermore, no public legal proceedings for corruption or bribery were initiated or concluded.

G1-4 Data point 2024 [number]	Pankl AG	Pankl Racing	SHW
Number of convictions for violations of corruption and bribery regulations	0	0	0
Amount of fines for violations of corruption and bribery regulations [€]	0	0	0
Total number and type of confirmed corruption and bribery cases	0	0	0
Number of confirmed cases of employee dismissal or disciplinary action due to corruption and bribery	0	0	0
Number of confirmed cases of contracts with business partners terminated or not renewed due to corruption and bribery-related violations	0	0	0

This absence of violations reflects the effectiveness of preventive measures, which are supported by regular training and awareness-raising programs. In particular, the mandatory annual e-learning on the Codes of

Conduct ensures that all employees are familiar with and able to apply the company's policies. During the reporting period, 61.4% of employees successfully completed this online training. (IRO 24)

KEY RATIOS AND TARGETS REGARDING THE WHISTLEBLOWER SYSTEM

In 2024, 14 cases were reported via the whistleblower systems / compliance contact point, of which 14 were not compliance-relevant.

ESRS Disclosure requirement	Chapter	Data point, disclosure	Valuation principles and assumptions
G1-3	21	Information on training on corruption and bribery	Successfully completed anti-corruption and bribery training courses are monitored online through the e-learning system, which sends invitations to all registered employees. The rollout of the e-learning system within the Pankl Group will be further expanded in 2025.
G1-4	24a	Legal action following violations of corruption and bribery regulations	The legal departments are responsible for monitoring legal action resulting from violations of corruption and bribery regulations.
G1-4	25a	Incidents related to corruption and bribery	The legal departments monitor incidents of corruption and bribery.
G1-4	/	Key figures and objectives regarding the whistleblower system	The legal departments monitor the whistleblower systems. The system is accessible to internal and external stakeholders.
G1-6	33c	Legal proceedings due to late payment	The legal departments monitor legal actions resulting from late payment.





ANNEX

Disclosure requirements ESRS2 – General disclosures		Chapter	Omission, explanation
BP-1	General basis for preparation of sustainability statements	BP-1	
BP-2	Disclosures in relation to specific circumstances	BP-2	The information can be found in the chapter ESRS 2 BP-2 as well as in the chapters in the topic standards.
GOV-1	The role of the administrative, management and supervisory bodies	GOV-1	
GOV-2	Information provided to and sustainability matters addressed	GOV-2	
GOV-3	Integration of sustainability-related performance in incentive schemes	GOV-3	
GOV-4	Statement on due diligence	GOV-4	
GOV-5	Risk management and internal controls over sustainability reporting	GOV-5	
SBM-1	Strategy, business model and value chain	SBM-1	
SBM-2	Interests and views of stakeholders	SBM-2	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	SBM-3	The information can be found in chapter ESRS 2 SBM-3 as well as in the chapters in the topic standards.
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	IRO-1	
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	IRO-2	

Disclosure requirements ESRS E1 – Climate change		Chapter	Omission, explanation
ESRS 2 GOV-3	Integration of sustainability-related performance in incentive schemes	ESRS 2 GOV-3	
E1-1	Transition plan for climate change mitigation	E1-1	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2 SBM-3; E1 ESRS 2 SBM-3	The information can be found in chapter ESRS 2 SBM-3 and in the topic standard.
ESRS 2 IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	ESRS 2 IRO-1	
E1-2	Policies related to climate change mitigation and adaptation	E1-2	
E1-3	Actions and resources in relation to climate change policies	E1-3	
E1-4	Targets related to climate change mitigation and adaptation	E1-4	
E1-5	Energy consumption and mix	E1-5	
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	E1-6	
E1-7	GHG removals and GHG mitigation projects financed through carbon credits	E1-7	
E1-9	Potential financial effects from material physical and transition risks and potential climate-related opportunities		Application of the option for gradual introduction according to ESRS 1 Annex C

Disclosure requirements ESRS E5 – Resource use and circular economy		Chapter	Omission, explanation
ESRS 2 IRO-1	Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	ESRS 2 IRO-1	
E5-1	Policies related to resource use and circular economy	E5-1	
E5-2	Actions and resources in relation to resource use and circular economy	E5-2	
E5-3	Targets related to resource use and circular economy	E5-3	
E5-4	Resource inflows	E5-4	
E5-5	Resource outflows	E5-5	
E5-6	Potential financial effects from resource use and circular economy-related impacts, risks and opportunities	E5-6	Application of the option for gradual introduction according to ESRS 1 Annex C

Disclosure requirements ESRS S1 – Own workforce		Chapter	Omission, explanation
ESRS S1 – Own workforce	Views and interests of stakeholders	ESRS 2 SBM-2	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	ESRS 2 SBM-3; S1 ESRS 2 SBM-3	
S1-1	Policies related to own workforce	S1-1	
S1-2	Processes for engaging with own workers and workers' representatives about impacts	S1-2	
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	S1-3	
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	S1-4	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S1-5	
S1-6	Characteristics of the undertaking's employees	S1-6	
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	S1-7	Application of the option for gradual introduction according to ESRS 1 Annex C
S1-9	Diversity metrics	S1-9	
S1-13	Training and skills development metrics	S1-13	
S1-14	Health and safety metrics	S1-14	
S1-15	Work-life balance metrics	S1-15	
S1-16	Compensation metrics (pay gap and total compensation)	S1-16	
S1-17	Incidents, complaints and severe human rights impacts	S1-17	

Disclosure requirements ESRS S2 – Workers in the value chain		Chapter	Omission, explanation
ESRS 2 SBM-2	Views and interests of stakeholders	ESRS 2 SBM-2	
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model	ESRS 2 SBM-3; S2 ESRS 2 SBM-3	
S2-1	Policies related to value chain workers	S2-1	
S2-2	Processes for engaging with value chain workers about impacts	S2-2	
S2-3	Processes to remediate negative impacts and channels for value chain workers to raise concerns	S2-3	
S2-4	Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	S2-4	
S2-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	S2-5	

Disclosure requirements ESRS S4 – Consumers and end-users		Chapter	Omission, explanation
ESRS 2 SBM-2	Views and interests of stakeholders		
ESRS 2 SBM-3	Material impacts, risks and opportunities and their interaction of with strategy and business model		
S4-1	Policies related to consumers and end-users		
S4-4	Taking action on material impacts on consumers and end-users, and approaches to mitigating material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions		
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities		

Disclosure requirements ESRS G1 Business conduct		Chapter	Omission, explanation
ESRS 2 GOV-1	The role of the administrative, supervisory and management bodies	ESRS 2 GOV-1	
ESRS 2 IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	ESRS 2 IRO-1	
G1-1	Corporate culture and business conduct policies	G1-1	
G1-2	Management of relationships with suppliers	G1-2	
G1-3	Prevention and detection of corruption or bribery	G1-3	
G1-4	Confirmed incidents of corruption or bribery	G1-4	
G1-6	Payment practices	G1-6	

LIST OF DATA POINTS IN GENERAL AND TOPIC STANDARDS ARISING FROM OTHER EU LEGISLATION (ESRS 2 ANNEX B)

Disclosure requirement and associated data point	Material	SFDR reference	Column 3 Reference	Benchmark regulation reference	EU Climate Law
ESRS 2 GOV-1 Gender diversity in management and supervisory bodies, paragraph 21(d)	Yes	Indicator no 13 in annex 1, table 1		Commission Delegated Regulation (EU) 2020/1816 ( 5 ), Annex II	
ESRS 2 GOV-1 Percentage of management body members who are independent, paragraph 21(e)	Yes			Commission Delegated Regulation (EU) 2020/1816, Annex III	
ESRS 2 GOV-4 Declaration of Due Diligence, paragraph 30	Yes	Indicator no 10 in annex 1, table 3			
ESRS 2 SBM-1 Participation in activities related to fossil fuels, paragraph 40(d)(i)	Yes	Indicator no 4 in annex 1, table 1	Article 449a of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 ( 6 ), Table 1: Qualitative information on environmental risks, and Table 2: Qualitative information on social risks	Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Participation in activities related to fossil fuels, paragraph 40(d)(ii)	Yes	Indicator no 9 in annex 1, table 2		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40(d)(iii)	Yes	Indicator no 14 in annex 1, table 1		Delegated Regulation (EU) 2020/1818 (7), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Participation in activities related to the cultivation and production of tobacco, paragraph 40(d)(iv)	Yes			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, paragraph 14	Yes				Regulation (EU) 2021/1119, Article 2, paragraph 1
ESRS E1-1 Companies exempted from the Paris-aligned benchmarks, paragraph 16(g)	Yes		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Asset Book – Transition risk related to climate change: Credit quality of exposures by sector, issue, and residual maturity	Delegated Regulation (EU) 2020/1818, Article 12(1)(d) to (g) and Article 12(2)	
ESRS E1-4 GHG emissions reduction targets,paragraph 34	Yes	Indicator No 4 in annex 1, table 2	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Asset Book – Transition risk related to climate change: Adjustment ratios	Delegated Regulation (EU) 2020/1818, Article 6	

Disclosure requirement and associated data point	Material	SFDR reference	Column 3 Reference	Benchmark regulation reference	EU Climate Law
ESRS E1-5 Energy consumption from fossil fuels by source (climate-intensive sectors only), paragraph 38	Yes	Indicator no 5 in annex 1, table 1 and indicator no 5 in annex 1, table 2			
ESRS E1-5 Energy consumption and energy mix, paragraph 37	Yes	Indicator no 5 in annex 1, table 1			
ESRS E1-5 Energy intensity related to activities in climate-intensive sectors, paragraphs 40 to 43	Yes	Indicator no 6 in annex 1, table 1			
ESRS E1-6 Gross GHG emissions in Scope 1, 2, and 3 categories and total GHG emissions, paragraph 444	Yes	Indicators no 1 and 2 in annex 1, table 1	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Asset Book – Transition risk related to climate change: Credit quality of exposures by sector, issue, and residual maturity	x	
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	Yes	Indicator no 3 in annex 1, table 1	Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Asset Book – Transition Risk Related to Climate Change: Adjustment Indicatorsn	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7 Removal of greenhouse gases and CO <sub>2</sub> certificates, paragraph 56	Yes				Regulation (EU) 2021/1119, Article 2, paragraph 1
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, paragraph 66	Yes			Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9 Breakdown of monetary amounts by acute and chronic physical risk, paragraph 66(a)	Yes		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Asset book – Physical risk related to climate change: Physical risk exposures		
ESRS E1-9 Location of significant assets with material physical risk, paragraph 66(c)					
ESRS E1-9 Breakdowns of the book value of its properties by energy efficiency class, paragraph 67(c)	Yes		Article 449a of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, paragraph 34; Template 2: Asset book – Transition risk related to climate change: Loans secured by immovable property – Energy efficiency of collateral		
ESRS E1-9 Degree of portfolio exposure to climate-related opportunities, paragraph 69	Yes			Commission Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water, and land, paragraph 28	Yes	Indicator no 8 in annex 1, table 1, indicator no 2 in annex 1, table 2, indicator no 1 in annex 1, table 2, indicator no 3 in annex 1, table 2			

Disclosure requirement and associated data point	Material	SFDR reference	Column 3 Reference	Benchmark regulation reference	EU Climate Law
ESRS E3-1 Water and Marine Resources, paragraph 9	No	Indicator no 7 in annex 1, table 2			
ESRS E3-1 Specific Concept, paragraph 13	No	Indicator no 8 in annex 1, table 2			
ESRS E3-1 Sustainable Oceans and Seas, paragraph 14	No	Indicator no 12 in annex 1, table 2			
ESRS E3-4 Total volume of water recovered and reused, paragraph 28 (c)	No	Indicator no 6.2 in annex 1, table 2			
ESRS E3-4 Total water consumption in m3 per net revenue from own activities, paragraph 29	No	Indicator no 6.1 in annex 1, table 2			
ESRS 2 – SBM-3 – E4, paragraph 16 (a) (i)	No	Indicator no 7 in annex 1, table 1			
ESRS 2 – SBM-3 – E4, paragraph 16 (b)	No	Indicator no 10 in annex 1, table 2			
ESRS 2 – SBM-3 – E4, paragraph 16 (c)	No	Indicator no 14 in annex 1, table 2			
ESRS 2 – SBM-3 – E4, paragraph 16 (c)	No	Indicator no 11 in annex 1, table 2			
ESRS E4-2 Sustainable land use and agriculture practices or policies, paragraph 24 (b)	No	Indicator no 12 in annex 1, table 2			
ESRS E4-2 Sustainable oceans/seas practices or policies, paragraph 24 (c)	No	Indicator no 15 in annex 1, table 2			
ESRS E4-2 Policies to combat deforestation, paragraph 24 (d)	Yes	Indicator no 13 in annex 1, table 2			
ESRS E5-5 Non-recycled waste, paragraph 37 (d)	Yes	Indicator no 9 in annex 1, table 1			
ESRS E5-5 Hazardous and radioactive waste, paragraph 39	Yes	Indicator no 13 in annex 1, table 3			
ESRS 2 SBM3 – S1 Risk of forced labor, paragraph 14 (f)	Yes	Indikator Nr. 12 in Anhang I Tabelle 3			
ESRS 2 SBM3 – S1 Risk of child labor, paragraph 14 (g)	Yes	Indicator no 9 in annex I, table 3 and indicator no 11 in annex I, table 1			
ESRS S1-1 Human rights policy commitments, paragraph 20	Yes			Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-1 Due diligence provisions with respect to issues addressed in fundamental Conventions 1 to 8 of the International Labor Organization, paragraph 21	Yes	Indicator no 11 in annex I, table 3			
ESRS S1-1 Procedures and measures to combat human trafficking, paragraph 22	Yes	Indicator no 1 in annex I, table 3			
ESRS S1-1 Occupational accident prevention policy or management system, paragraph 23	Yes	Indicator no 5 in annex I, table 3			
ESRS S1-3 Complaints handling, paragraph 32 (c)	Yes	Indicator no 2 in annex I, table 3		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-14 Number of fatalities and number and rate of occupational accidents, paragraph 88 (b) and (c)	Yes	Indicator no 3 in annex I, table 3			
ESRS S1-14 Number of days lost due to injury, accidents, death, or illness, paragraph 88 (e)	Yes	Indicator no 12 in annex I, table 1		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Unadjusted gender pay gap, paragraph 97 (a)	Yes	Indicator no 8 in annex I, table 3			
ESRS S1-17 Incidents of discrimination, paragraph 103 (a)	Yes	Indicator no 7 in annex I, table 3			
ESRS S1-17 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 104 (a)	Yes	Indicator no 10 in annex I, table 1 and indicator no 14 in annex I, table 3		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)	
ESRS 2 SBM3 – Significant risk of child labor or forced labor in the value chain, paragraph 11 (b)	Yes	Indicators no 12 and 13 in annex I, table 3			
ESRS S2-1 Human rights policy commitments, paragraph 17	Yes	Indicator no 9 in annex 1, table 3 and indicator no 11 in annex 1, table 1			

Disclosure requirement and associated data point	Material	SFDR reference	Column 3 Reference	Benchmark regulation reference	EU Climate Law
ESRS S2-1 Concepts related to value chain workers, paragraph 18	Yes	Indicators no 11 and 4 in annex 1, table 3			
ESRS S2-1 Non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines, paragraph 19	Yes	Indicator no 10 in annex 1, table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)	
EESRS S2-1 Due Diligence requirements in relation to issues addressed in fundamental conventions 1 to 8 of the International Labor Organization, paragraph 19	Yes			Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-4 Human Rights issues and incidents within the upstream and downstream value chain, paragraph 3	Yes	Indicator no 14 in annex 1, table 3			
ESRS S3-1 Human Rights obligations, paragraph 16	No	Indicator no 9 in annex 1, table 3 and indicator no 11 in annex 1, table 1			
ESRS S3-1 Non-compliance with the United Nations guiding principles on business and human rights, the ILO Principles, or the OECD Guidelines, paragraph 17	No	Indicator no 10 in annex 1, table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)	
ESRS S3-4 Human rights issues and incidents, paragraph 36	No	Indicator no 14 in annex 1, table 3			
ESRS S4-1 Concepts related to consumers and end-Users, paragraph 16	Yes	Indicator no 9 in annex 1, table 3 and indicator			
ESRS S4-1 Non-compliance with the United Nations guiding principles on business and human rights and the OECD Guidelines, paragraph 17	Yes	Indicator no 10 in annex 1, table 1		Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Article 12(1)	
ESRS S4-4 Human rights issues and incidents, paragraph 35	Yes	Indicator no 14 in annex 1, table 3			
ESRS G1-1 United Nations convention against corruption, paragraph 10 (b)	Yes	Indicator no 15 in annex 1, table 3			
ESRS G1-1 Protection of whistleblowers, paragraph 10 (d)	Yes	Indicator no 6 in annex 1, table 3			
ESRS G1-4 Fines for violations of corruption and bribery regulations, paragraph 24 (a)	Yes	Indicator no 17 in annex 1, table 3		Commission Delegated Regulation (EU) 2020/1816, Annex II	
ESRS G1-4 Anti-corruption and bribery standards, paragraph 24 (b)	Yes	Indicator no 16 in annex 1, table 3			



**PANKL AG**

<https://pankl.com/>

**PANKL RACING SYSTEMS AG**

<https://pankl.com/racing/de/>

**SHW AG**

<https://www.shw.de/de/home/>

**CODE OF CONDUCT DER PANKL AG FOR BUSINESS PARTNERS**

<https://pankl.com/code-of-conduct/>

**GUIDELINES / POLICY / STATEMENT OF PRINCIPLES OF PANKL AG**

<https://pankl.com/nachhaltigkeit/downloads/>

**DATA PROTECTION DECLARATION OF PANKL AG**

<https://pankl.com/datenschutz/>

**WHISTLEBLOWING PLATFORM**

<https://pankl.integrityline.com/frontpage>

**GUIDELINE REGARDING THE CORPORATE SUSTAINABILITY REPORTING DIRECTIVE (CSRD)**

<https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=CELEX:32022L2464>

[https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=OJ:L\\_202302772](https://eur-lex.europa.eu/legal-content/DE/TXT/PDF/?uri=OJ:L_202302772)

**ESRS STANDARD**

[https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=OJ:L\\_202490457](https://eur-lex.europa.eu/legal-content/DE/ALL/?uri=OJ:L_202490457)

**GLOBAL REPORTING INDEX**

<https://www.globalreporting.org/>

**CONVENTION OF THE INTERNATIONAL LABOR ORGANISATION C138**

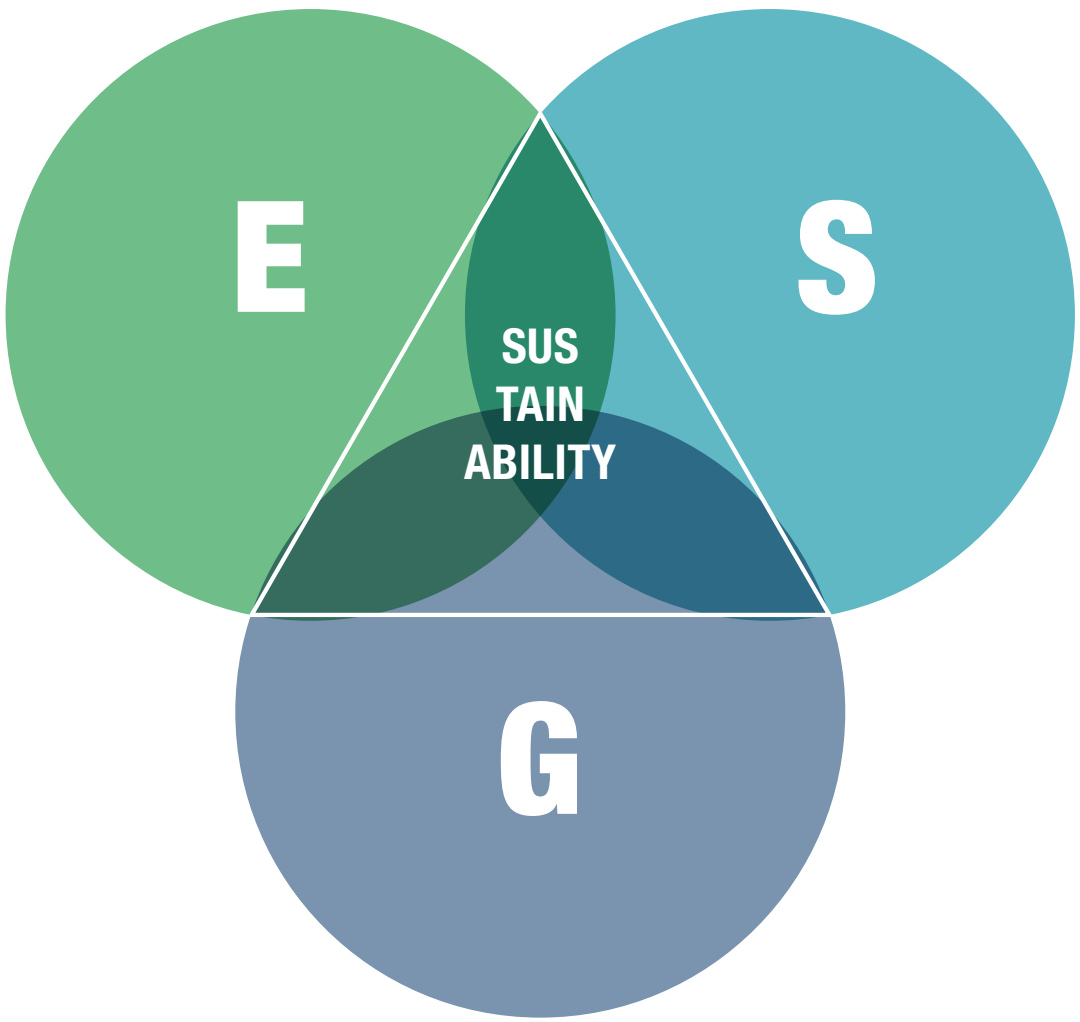
[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C138](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138)

**CONVENTION OF THE INTERNATIONAL LABOR ORGANISATION C182**

[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)

**PROVISIONS OF THE CORE LABOUR STANDARDS OF THE INTERNATIONAL LABOR ORGANISATION**

<https://www.ilo.org/international-labour-standards#standards>



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Industriestraße West 4  
A-8605 Kapfenberg

