

SCHALTBAU
HOLDING

Sustainability Report **2025**

published by
Schaltbau Holding AG

Making energy
and mobility safer,
more efficient and
more sustainable.



CONTENTS

1. GENERAL INFORMATION.....	4
1.1. ESRS 2 General Disclosures.....	4
1.1.1. General basis for preparation of the sustainability statement.....	4
1.1.2. Overview of the business model, value chain, and Schaltbau Group's position within the value chain.....	4
1.1.3. Impact, risk and opportunity management.....	8
1.1.4. Governance.....	14
2. ENVIRONMENTAL INFORMATION.....	16
2.1. E1 Climate Change.....	16
2.1.1. Impact, risk and opportunity management.....	16
2.1.2. Metrics.....	19
2.2. E5 Resource Use and Circular Economy.....	20
2.2.1. Impact, risk and opportunity management.....	21
2.2.2. Metrics.....	23
3. SOCIAL INFORMATION.....	25
3.1. S1 Own workforce.....	25
3.1.1. Impact, risk and opportunity management.....	25
3.1.2. Metrics.....	28
3.2. S2 Workers in the value chain.....	32
3.2.1. Impact, risk and opportunity management.....	32
4. GOVERNANCE INFORMATION.....	35
4.1. G1 Business Conduct.....	35
4.1.1. Impact, risk and opportunity management.....	35
4.1.2. Metrics related to business conduct.....	39
5. APPENDIX.....	40
5.1. Policy overview.....	40

SUSTAINABILITY KEY FIGURES 2025

Selected sustainability metrics of the Schaltbau Group for fiscal year 2025.

—
-30 %

Scope 1 & 2 GHG reduction target
by 2030 (base year 2024)

—
2,626

employees worldwide
(Dec 31, 2025)

—
98 %

of employees covered by a health &
safety management system

—
87 %

of employees participated in performance
& development reviews

—
0

work-related fatalities
in 2025

—
61.5 %

of employees covered by collective
bargaining agreements

1. GENERAL INFORMATION

1.1. ESRS 2 General Disclosures

1.1.1. General basis for preparation of the sustainability statement

The Schaltbau Holding AG prepared a consolidated sustainability statement for the Schaltbau Group for fiscal year 2025. Schaltbau Group comprises the Schaltbau Holding AG and its fully consolidated subsidiaries. Its operating businesses are Schaltbau GmbH, Pintsch GmbH and Bode – Die Tür GmbH, including their respective fully consolidated subsidiaries. In this report, Schaltbau refers to Schaltbau GmbH, Pintsch refers to PINTSCH GmbH and Bode refers to Bode – Die Tür GmbH, unless stated otherwise. The scope of the consolidated sustainability statement corresponds to the scope of the consolidated financial statements.

This report has been prepared with reference to the European Sustainability Reporting Standards (ESRS). It is based on the draft simplified ESRS published by the European Financial Reporting Advisory Group (EFRAG) in November 2025. As this report represents a transition report, disclosures are presented based on the data, methodologies and reporting processes available for the reporting period. Selected ESRS disclosure requirements have not been fully applied due to limitations in data availability, methodologies or systems. As a transition report, this sustainability statement is intended to establish a structured basis for the Schaltbau Group's future ESRS-aligned reporting. It reflects the reporting processes, data availability and methodologies in place for the reporting period. The Group's near-term focus is on improving the completeness, consistency and auditability of sustainability data, strengthening internal controls and gradually expanding the coverage of metrics, targets and action plans in line with the ESRS. The Schaltbau Group continues to develop its sustainability reporting processes and data management capabilities in line with the ESRS. Where relevant, limitations are described in the respective sections. As the ESRS are still under development, selected metrics and targets are not included in this report.

1.1.2. Overview of the business model, value chain, and Schaltbau Group's position within the value chain

The Schaltbau Group operates as a global provider of safety-critical components, systems and infrastructure solutions for rail transport and direct-current applications. With 30 production and sales locations across 14 countries, supplemented by an extensive network of external distributors, the Group holds a strong international position and serves customers in Europe, North America and Asia.

Its operating businesses Schaltbau, Pintsch and Bode operate in markets associated with long-term sustainability trends: the modernisation and expansion of rail transport, the electrification of industrial applications, the integration of renewable energy, the increasing use of battery systems and the development of charging infrastructure.

This market exposure is central to the Group's business strategy. Schaltbau Group's products are used in applications where safety, reliability, durability and efficiency are essential. The Group's strategic focus is therefore not limited to reducing the sustainability impacts of its own operations; it is also linked to the role its technologies play in enabling a safer and more reliable infrastructure over long product lifecycles.

The Group's business model combines three complementary activities:

Pintsch develops and supplies safety-critical technologies for railway infrastructure, including level-crossing safety systems, signalling equipment, axle counters, point heating systems and related service offerings. Pintsch's business is linked to the modernisation, safety and availability of rail networks. Its strategic repositioning has focused the business on core rail infrastructure products and manageable project scopes, thereby

strengthening the link between operational resilience, safety performance and profitable growth. Through its portfolio, Pintsch supports the reliability and continued renewal of rail infrastructure and contributes to rail projects that enhance lower-emission transport.

Bode develops and manufactures door, entrance and boarding systems for rolling stock. Its portfolio supports safe, reliable and accessible passenger mobility. Bode's business model combines original equipment activities with a recurring after sales and spare-parts business based on a large installed base. This lifecycle-oriented model is relevant from a sustainability perspective because product durability, spare-parts availability, maintainability and reliable operation support the efficient use and extended service life of rail vehicles. Bode's strategic positioning around safety, reliability, comfort and sustainability reflects its role in enabling accessible and future-oriented public transport.

Schaltbau develops and manufactures safety-critical direct-current components, including contactors, connectors, switching devices and related technologies. Historically rooted in rail applications, Schaltbau applies its DC expertise increasingly to New Energy, New Industry and e-mobility applications. Its products switch, connect, control and protect DC applications used in energy storage systems, charging infrastructure, industrial electrification, electric vehicles, test systems and other applications shaped by the electrification of energy and mobility systems. Through the Eddicy subbrand, Schaltbau is strengthening its positioning in energy and e-mobility applications.

Across its operating businesses, the Group's strategy is therefore active in markets affected by rail infrastructure renewal, electrification, energy storage and charging infrastructure. In general, rail solutions support lower-emission mass transport and the renewal of critical infrastructure. DC technologies support electrification, renewable-energy integration, battery systems and charging infrastructure. Door and access systems support safe, reliable and accessible public mobility. These business activities form the strategic context for the Group's sustainability approach.

Sustainability strategy and link to business strategy

The Schaltbau Group's sustainability strategy builds on this business context. Sustainability is treated as an integral part of how the Group manages long-term value creation, operational resilience and stakeholder expectations. The Group's strategic priorities — growth in rail, New Energy/New Industry and e-mobility, innovation in DC technologies, operational excellence and the development of a modern organisation — are closely connected with the sustainability topics identified as relevant for the Group.

The sustainability strategy focuses on areas where the Group can both manage its own impacts and strengthen the resilience and competitiveness of its business model. These areas include energy and greenhouse gas emissions, resource efficiency, occupational health and safety, employee development, responsible sourcing, product durability, material compliance, information security and lawful business conduct.

The Group structures its sustainability approach around three pillars:

Climate and Environment

The Climate and Environment pillar addresses the environmental impacts of the Group's own operations and value chain. The focus is on energy efficiency, greenhouse gas emissions, resource efficiency, waste management and environmental management systems. The Group aims to reduce Scope 1 and Scope 2 greenhouse gas emissions by 30% by 2030. At the same time, the Group's technologies are used in markets that support electrification and lower-emission mobility, including rail transport, energy storage, charging infrastructure and DC-based industrial applications.

Care for People

The Care for People pillar reflects the Group's responsibility towards employees and its dependence on qualified, engaged and safety-conscious people. The focus is on occupational health and safety, fair working conditions, social dialogue, equal treatment, skills development and leadership capabilities. This is closely linked to the Group's business model, as safety-critical products and systems require strong engineering capabilities, disciplined operational execution and a culture of quality and responsibility.

Product and Supply Chain

The Product and Supply Chain pillar addresses sustainability-related aspects of the Group's products, technologies and supplier relationships. The focus is on designing products with durability, reliability and long service life in mind, as well as supporting maintainability and compliance with applicable material requirements. It also covers approaches to responsible sourcing, supplier standards, quality management and transparent business practices. These topics respond to customer expectations in rail, infrastructure, energy and industrial markets, where safety, compliance, reliability and lifecycle performance are key purchasing criteria.

The Group's sustainability strategy therefore connects two perspectives: managing the environmental, social and governance impacts of its own operations and value chain, and strengthening the Group's strategic position in markets that are driven by electrification, resilient infrastructure and sustainable mobility.

Strategic pillar	Strategic focus	Selected current highlights
Climate and Environment	Reducing environmental impacts from own operations and the value chain, with a focus on energy, emissions, resource efficiency and environmental management. This includes the Group's target to reduce Scope 1 and Scope 2 greenhouse gas emissions by 30% by 2030.	The NEXt Factory in Velden is a key example of how the Group links production with direct-current energy architecture. The site is designed to operate without fossil fuels in regular operations and combines photovoltaic generation, storage solutions and an AI-supported energy management system. In 2025, this approach received external recognition through the German Excellence Award 2025 for the activity-based workplace concept and the FREDDIE AI Industrial Award 2025 in the sustainability category for the AI-based energy management system.
Care for People	Strengthening responsibility towards employees through safe and fair working conditions, occupational health and safety, social dialogue, equal treatment and skills development.	In 2025, 87% of employees participated in formalised performance and career development reviews. 98% of employees were covered by a health and safety management system based on legal requirements and/or recognised standards, and no work-related fatalities were reported.
Product and Supply Chain	Addressing sustainability-related aspects of products, technologies and supplier relationships, including durable products, material compliance, responsible sourcing and transparent business conduct.	The Group addresses product-related sustainability through durable, safety-critical technologies, material compliance, responsible sourcing, and targeted resource-efficiency initiatives. Schaltbau's Eddicy portfolio further strengthens the Group's positioning in energy and e-mobility applications. In 2025, the Eddicy SC503 smart contactor received the German Innovation Award for its integrated real-time monitoring and intelligent control functions, which enhance system stability and improve energy efficiency in demanding direct-current and alternating-current applications.

Value Chain Overview

In relation to the Schaltbau Group's business model, the relevant value chain comprises upstream sourcing activities, own operations and downstream activities related to the use, servicing and end-of-life treatment of its products and systems. The Schaltbau Group's position within this value chain is primarily in engineering,

manufacturing, assembly, system integration and lifecycle services, complemented by selected installation, commissioning, maintenance, modernisation and refurbishment activities depending on the segment and project context.

In the upstream value chain, the Schaltbau Group sources industrial inputs required for the manufacture of safety-critical components, systems and infrastructure solutions. These include metals, electronic sub-assemblies, mechanical parts, plastics, surface-treatment materials and specialised services. Suppliers and service providers support the availability of materials, components and project-related services required for applications in rail infrastructure, rolling stock and DC-power solutions. Sustainability-related considerations in the upstream value chain are mainly linked to resource use, emissions, working conditions and human rights risks in supplier industries and geographies.

Within its own operations, the Schaltbau Group performs engineering, design, testing, manufacturing, assembly, system integration and lifecycle services. Core manufacturing processes include welding, milling, drilling, glueing, injection moulding and painting. These activities support the production of components and assemblies that must meet high safety, quality and reliability requirements, particularly in rail and electrification applications. The Schaltbau Group's own operations are therefore closely linked to sustainability topics such as energy use, greenhouse gas emissions, resource consumption, waste, occupational health and safety, and working conditions.

In the downstream value chain, the Schaltbau Group's products and systems are integrated into applications operated by railway operators, rolling-stock manufacturers, infrastructure providers and customers in electrification and energy-related markets. The Schaltbau Group also supports installation, commissioning, maintenance, modernisation and refurbishment activities, depending on the product and project context. Due to their long service life, many products are used over extended operating periods and may contribute to lifecycle efficiency, operational safety and system availability. At the end of their lifecycle, products or components may enter refurbishment, reuse or recycling streams, depending on technical feasibility and customer requirements.

Relevance of products and services in achieving sustainability objectives and sectoral exclusions

Across its served markets, the Schaltbau Group products are used in rail, infrastructure and electrification applications that support lower-emission transport and energy-related systems.

Based on the available information, the Schaltbau Group has not identified products or services that are banned in specific markets. The Schaltbau Group is not active in the fossil fuel sector, including coal, oil or gas, and is not engaged in chemical production. There is also no involvement in the development, manufacturing or distribution of controversial weapons and no participation in the cultivation or production of tobacco. Consequently, the Schaltbau Group does not report revenues from these sectors.

Interests and views of stakeholders

Stakeholder Engagement and Understanding of Stakeholder Interests

The Schaltbau Group engages with relevant stakeholder groups through existing business, governance and communication channels. These include the corporate website and information events, participation in industry bodies and associations, and research collaborations with academic institutions. Insights from these interactions support the understanding of stakeholder interests and complement the materiality assessment.

Key stakeholder groups considered in the Schaltbau Group's sustainability-related engagement and materiality assessment include customers, employees, suppliers and service providers, investors and insurers, governmental bodies and public authorities, educational and research institutions, auditors and analysts, industry associations, and the broader public. In the double materiality assessment (DMA), stakeholder perspectives were considered primarily through internal stakeholder representatives and topical experts, including functions that maintain regular interaction with relevant stakeholder groups.

The relevance of these stakeholder groups differs by topic and interaction channel. Customers increasingly address sustainability requirements through tenders, request for audit certificates, ESG questionnaires and product-related requirements. Employees and their representatives provide perspectives on working conditions, occupational health and safety, social dialogue and equal treatment. Suppliers and service providers are particularly relevant for responsible sourcing, material compliance and human rights due diligence. Investors, insurers, auditors and public authorities provide input through governance, risk, compliance and reporting requirements. Research institutions and industry associations support the Group's understanding of technological developments, innovation and sector-specific sustainability expectations.

The Management Board and relevant management functions are informed about stakeholder views and interests through existing governance and reporting channels, including regular review meetings, sustainability-related reporting processes and bi-monthly Management Board meetings. These forums provide a basis for discussing selected non-financial information, sustainability reporting progress, implementation activities and relevant sustainability-related initiatives.

1.1.3. Impact, risk and opportunity management

Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported

Sustainability due diligence and materiality process

In the reporting period, the Schaltbau Group implemented a structured sustainability due diligence and double materiality assessment process aligned with the ESRS. The process covered the Schaltbau Group's entire value chain and served as the basis for identifying, assessing, prioritising and monitoring impacts, risks and opportunities related to environmental, social and governance topics.

The assessment followed a multi-step approach. As part of the DMA process, relevant internal and external information has been reviewed to reflect the Group's business model, production activities, geographic footprint and value chain structure. This included, among others, internal risk management and supply chain due diligence information, internal policies, prior sustainability reporting, peer and sector information, and external risk assessment tools.

In accordance with ESRS 1 Application Requirement 16, a comprehensive long list of ESG topics was established based on the ESRS topic structure and complemented by internal analysis as well as external benchmarks including sector and peer information. This long list was subsequently refined to a short list of potentially relevant topics for the Schaltbau Group. Based on the documented DMA process, no additional company-specific or sector-specific topics beyond

those covered by the ESRS-based topic list were identified.

For each short-listed topic, specific impacts, risks and opportunities (IROs) were identified with reference to the Schaltbau Group's business model and value chain. In line with ESRS, the assessment distinguished between inside-out impacts on people and the environment and outside-in financial risks and opportunities. The resulting IRO catalogue provided the basis for the assessment of impact and financial materiality for the subsequent determination of material disclosure requirements and related data points.

Identification, assessment and prioritisation of impacts, risks and opportunities

The identification and assessment of IROs were performed using a standardised scoring methodology. For impacts on people and the environment, the assessment followed the ESRS criteria of severity and likelihood. Severity was operationalised along three dimensions: scale (degree of harm or benefit), scope (number of stakeholders potentially affected and geographical reach) and irremediability (reversibility of the impact). Likelihood reflected the probability of occurrence within short-, medium- and long-term time horizons.

For negative impacts, all three severity dimensions were considered. For positive impacts, the assessment focused on scale and scope in line with the ESRS guidance. Impact scores were calculated by combining

likelihood with an average of the severity dimensions using a four-point scale (1 = low to 4 = very high). The approach reflected the ESRS principle that the seriousness of potential human rights impacts may outweigh likelihood and that severe impacts can be material even at lower probabilities.

For sustainability-related financial risks and opportunities, the assessment considered two core criteria: likelihood of occurrence and the magnitude of potential financial effects. The magnitude assessment was based on financial ranges defined with reference to the Schaltbau Group's enterprise risk management logic, and likelihood was assessed on a four-point scale consistent with the impact assessment. Both criteria were considered on a gross basis, i.e. before considering existing risk mitigation measures or controls. The financial materiality score resulted from multiplying the likelihood and magnitude scores.

The assessment considered:

- The part of the value chain primarily affected (upstream, own operations, downstream);
- The time horizon in which the risk or opportunity was expected to materialise (short, medium, long term);
- The nature of the underlying dependency or trigger, differentiating between factors under the Schaltbau Group's control, business relationship dependencies and resource dependencies; and
- The main type of capital affected (e.g. natural, human, social and relationship or financial capital), to ensure consistency with the ESRS financial materiality concept.

For each topic, individual IRO scores for impact materiality and financial materiality were aggregated to form a topic-level impact score and a topic-level financial score. These topic scores determined the position of the topics in the double materiality matrix and were used to prioritise those topics where the Schaltbau Group's impacts or financial exposure were most significant.

Application of severity and likelihood

The prioritisation of IROs and topics was driven by the combined assessment of severity and likelihood. For

impacts, severity was the primary driver of materiality. In line with ESRS guidance, particular emphasis was placed on those potential impacts that could be severe due to large scale, wide scope or irreversibility, particularly in the context of human rights and environmental harms. Topics where potential impacts involved loss of life, serious physical injury, severe human rights infringements or substantial and lasting environmental degradation were rated at the higher end of the severity scale.

Likelihood ratings reflected available internal and external information, including the Schaltbau Group's existing risk analysis, external risk tools (such as sector and country risk filters) and expert judgement from internal stakeholders. The combination of severity and likelihood produced an impact materiality score for each IRO and, after aggregation, for each topic.

For financial risks and opportunities, prioritisation was based on the potential financial magnitude and likelihood. Risks and opportunities that could lead to significant financial effects—such as material fines, loss of revenue, cost increases or capital expenditure requirements—were given higher magnitude scores. Likelihood assessments considered both current and emerging trends, including regulatory developments, customer requirements and technology shifts relevant to the Schaltbau Group's core segments of Rail and DC power.

The prioritisation process also considered specific activities and geographies that are typically associated with heightened risk. This included labour and human rights risks in parts of the upstream supply chain (for example, risks of child and forced labour), occupational health and safety risks in manufacturing operations, and environmental risks related to emissions, resource use, waste and water in production processes. Where external country and sector risk assessments indicated elevated risk levels, this was reflected in the scoring and considered in the prioritisation of topics.

Consideration of prevention, mitigation and remediation actions

The scoring of IROs was performed on a gross basis. Existing and planned prevention, mitigation and remediation measures were considered qualitatively when interpreting the assessment results and

identifying potential follow-up actions. This included relevant, existing policies, supply chain due diligence processes, occupational health and safety management, environmental management and compliance structures. Geographies, business relationships and value chain stages associated with heightened risk were considered in the prioritisation of due diligence responses.

Integration into decision-making and stakeholder involvement

The sustainability due diligence and materiality assessment process informed decision making at several levels. The outcome of the DMA was used to:

- define the set of material ESRS topics for reporting purposes,
- derive the material disclosure requirements and data points from the ESRS data point catalogue, including a classification into fully material, partially material and not material data points; and
- provide input for the Schaltbau Group's sustainability strategy, targets and action plans, as well as for the design of future data and reporting processes.

Stakeholder perspectives were incorporated through internal stakeholder representatives and topical experts. The process involved experts from relevant functions and segments, and representatives of subsidiaries where appropriate. Functional expertise included, among others, procurement, HR, risk and compliance, controlling, operations, environmental and occupational health and safety. Identified and assessed IROs were validated in several joint workshops. The steering committee, composed of the Management Board of Schaltbau Holding AG, was regularly informed and involved at key milestones of the process.

The final double materiality matrix, including the thresholds for impact and financial materiality and the resulting list of material topics, was reviewed and discussed in the supervisory board meetings referred to above.

Changes compared with the prior reporting period

Compared with prior reporting periods, the process described above represents further formalisation and enhancement of the Schaltbau Group's sustainability due diligence and materiality assessment.

The link to the ESRS disclosure requirements and data points was established, enabling a systematic identification of material disclosures in addition, cross functional involvement and the use of external benchmarks were strengthened.

The methodology was applied consistently throughout the reporting period with no fundamental changes. Adjustments were limited to targeted refinements such as the calibration of likelihood and magnitude scales in alignment with the ERM framework without affecting the overall approach.

Material impacts, risks and opportunities and disclosure requirements included in the sustainability statement

	Type	Time horizon	Value chain		
	PI/NI/ O/R	A/S/M/L	Upstream	Own operations	Downstream
Environment					
Climate change adaptation					
Physical climate risks, particularly in India, affect the Schaltbau Group's sites and supply chain, causing disruptions and increased repair and insurance costs.	R	M		•	
Climate change mitigation					
Contributing to global warming by greenhouse gas emissions resulting from own production activities (Scope 1 and 2).	NI	A		•	
Contributing to global warming by greenhouse gas emissions related to sourcing materials, logistics and usage of our products	NI	A	•		•
Inadequate management of GHG emissions and removals may delay effective climate mitigation and contribute to continued GHG emissions.	NI	S		•	
Transition risk: Insufficient foresight into upcoming carbon regulations and increasing carbon and energy prices lead to higher costs and penalties.	R	M		•	
Energy					
Use of renewable energy in own operations reduces GHG emissions associated with electricity consumption.	PI	A		•	
Transition risk: Insufficient reduction of energy consumption may result in increased financial exposure driven by rising energy prices	R	M		•	
Resource inflows					
Use and upstream extraction of primary raw materials contribute to the depletion of finite resources.	NI	A	•		
New business and consumer models based on circularity can drive revenue growth and strengthen Schaltbau Group's reputation	O	M		•	
Resource outflows (waste)					
Negative impacts arising from the generation, treatment and disposal of non-hazardous waste in the Schaltbau Group's manufacturing operations	NI	A		•	
Negative impacts resulting from the generation and handling of hazardous waste in the Schaltbau Group's own manufacturing operations	NI	A		•	
Social					
Own workforce: Social dialogue, freedom of association, works councils, participation rights of workers, and collective bargaining					
Restrictions on freedom of association, including limitations on works councils and employee participation rights, may lead to violations of human and labour rights and reduced workforce satisfaction.	NI	M		•	
Restrictions on collective bargaining rights may lead to violations of worker rights and reduced workforce satisfaction	NI	M		•	
Own workforce: Health and safety					

	Type	Time horizon	Value chain		
	PI/NI/ O/R	A/S/M/L	Upstream	Own operations	Downstream
Insufficient preventive measures such as training and personal protective equipment may lead to adverse health impacts from manufacturing activities.	NI	A		•	
Adverse working conditions, such as excessive workload, may negatively affect employees' mental health and well-being.	NI	S		•	
Own workforce: Working conditions (incl. Adequate wages, work-life balance, working time, secure employment, social protection)					
Impact on employees' health arising from prolonged physical strain and workplace-related exposure.	NI	A		•	
Own workforce: Diversity and equal treatment					
Impact on equal treatment and diversity resulting from insufficient inclusion and access to equal opportunity within the workforce.	NI	S		•	
Own workforce: Other labour-related human rights (incl. Child labour, forced labour, privacy and adequate housing, water and sanitation)					
The occurrence of child labour results in legal exposure and reputational damage, leading to potential fines, litigation costs and adverse impacts on stakeholder trust.	R	S		•	
Workers in the value chain: Working conditions (incl. Adequate wages, work-life balance, working time, secure employment, social protection)					
Lack of secure employment (e.g. zero-hour contracts) may result in income instability and job insecurity for workers in the value chain.	NI	S	•		
Impact on the physical and mental health of workers in the value chain arising from excessive or non-compliant working hours.	NI	S	•		
Impact on the health and safety of workers in the value chain arising from inadequate occupational safety measures.	NI	S	•		
Workers in the value chain: Other labour-related human rights (incl. Child labour, forced labour, privacy and adequate housing, water and sanitation)					
Impact on children's rights and development arising from the use of child labour in the value chain.	NI	S	•		
Impact on fundamental labour rights arising from the use of forced or compulsory labour in the value chain.	NI	S	•		
Governance					
Corporate culture (incl. Anti-corruption and bribery, the protection of whistle-blowers and animal welfare)					
Non-compliance with existing and upcoming regulations, laws and tariffs leads to reputational and regulatory risks.	R	S		•	
Cyber-attacks on IT infrastructure may cause system disruptions, leading to operational downtime and financial and reputational damage.	R	S		•	
Incidents of corruption and bribery within own operations may negatively affect business partners and other stakeholders.	NI	M		•	
Insufficient internal controls and compliance frameworks may result in fraud, corruption, regulatory violations and associated financial and reputational damage.	R	S		•	

	Type	Time horizon	Value chain		
	PI/NI/ O/R	A/S/M/L	Upstream	Own operations	Downstream
Management of relationships with suppliers (incl. Payment practices especially late payment to small- and medium sized undertakings)					
Negative supplier management practices (e.g. late payments) may undermine suppliers' economic stability and contribute to poor working conditions.	NI	S	•		
Inadequate supplier relationship management may result in supply chain disruptions, loss of key suppliers and reputational damage.	R	S		•	
Legend	PI Positive impact NI Negative impact O Opportunity R Risk		A Actual impact S Short-term M Medium-term L Long-term		

Interaction of material impacts, risks and opportunities with strategy and business model and financial effects

Material impacts and their connection to Strategy and Business Model

The Schaltbau Group's business model is linked to sustainability matters through its role as a provider of safety-critical rail infrastructure, rolling-stock systems and direct-current power components. Its products are used in rail, infrastructure and electrification applications that may support lower-emission mobility and energy systems, depending on the specific use case. In addition, the durability, safety requirements and long service lives of many Schaltbau products are relevant from a resource-efficiency perspective. Products and systems used in rail and infrastructure applications are typically designed for high reliability, maintainability and long-term availability. These characteristics can support extended product lifecycles and reduce the need for premature replacement, where supported by customer requirements, maintenance concepts and technical feasibility. At the same time, the Schaltbau Group's manufacturing activities and value chain depend on energy, raw materials, components and specialised supplier inputs. This creates links to climate change, resource use, waste, working conditions, human rights in the value chain and responsible business conduct.

Material Environmental Impacts and Strategic Response

Climate-related impacts, such as heat stress, flooding and vector-borne diseases, may affect operations, supply chains and communities. The Schaltbau Group addresses climate-related impacts primarily through site- and segment-level environmental management systems, selected energy-efficiency measures and renewable electricity sourcing where available. The NExT Factory in Velden represents an important site-level example of this approach, designed to reduce operational emissions through electrification, photovoltaic generation and energy-efficiency measures.

Resource-related impacts arise mainly from raw materials and components used in manufacturing and from waste generated in own operations. The Schaltbau Group addresses these topics through resource-conserving product and process considerations, RoHS- and REACH-compliant materials, supplier declarations and selected material optimisation initiatives.

Material Social Impacts and Strategic Response

Human rights and labour-related topics are addressed through the Schaltbau Group's governance framework and due diligence processes. Relevant topics include potential child labour, forced labour, unsafe working conditions and discrimination in the value chain. The Schaltbau Group addresses these through Codes of Conduct, supplier onboarding, risk assessments, preventive measures, escalation processes and contractual requirements.

Within its own operations, The Schaltbau Group addresses employee-related topics such as freedom of association, collective bargaining, equal opportunities, working conditions and occupational health and safety. Measures include employee representation structures, collective bargaining agreements, anti-discrimination measures, occupational health and safety training and subsidiary-level prevention programmes. The Schaltbau Group monitors injury frequency and severity and performs root-cause analyses to support prevention.

Effects of material risks and opportunities on the business model and value chain and the undertaking's response

The Schaltbau Group's business model and value chain are exposed to sustainability-related risks and opportunities that may affect operational continuity, cost structures and long-term competitiveness. Physical climate risks may disrupt sites, supply chains or customer infrastructure. Transition risks may arise from regulatory developments, market expectations, carbon-pricing mechanisms and energy costs. Human rights risks in the supply chain may lead to legal or reputational exposure, particularly where child labour or forced labour risks are present. Cybersecurity incidents may lead to business disruption, data loss and reputational damage. Non-compliance with existing or future regulations may adversely affect market access, stakeholder trust and business relationships.

The Schaltbau Group also sees opportunities in circular business models, refurbishment projects and extended product lifecycles. These approaches can support resource efficiency and strengthen customer relationships where they meet market and technical requirements.

The Schaltbau Group responds to these risks and opportunities through compliance processes, supply chain due diligence, environmental and energy management, cybersecurity measures and selected investments in resilient and innovative technologies. These measures support the Schaltbau Group's ability to adapt to changing regulatory, market and customer requirements.

Material Adjustment to Assets and Liabilities

Based on the outcomes of the DMA, no sustainability-related risks or opportunities were identified that meet the threshold of being likely to cause a material adjustment to the Schaltbau Group's financial position within the defined timeframe. We continue to monitor our operating environment, regulatory developments, and sustainability-related risk landscape to ensure timely identification and assessment of any emerging material adjustments.

1.1.4. Governance

The role of the administrative, management and supervisory bodies

The Schaltbau Group is managed by the Management Board (Vorstand) and overseen by the Supervisory Board of the Schaltbau Holding AG. As of 31 December 2025, the Management Board comprised one member and the Supervisory Board three members. There were no changes in the composition of either the Management Board or the Supervisory Board during the reporting period.

All members of the Management Board and Supervisory Board were male. Accordingly, the gender diversity ratio of the management and supervisory bodies was 0% female and 100% male as of 31 December 2025. No members of the Supervisory Board were classified as independent, and no employees or other workers were represented on the Supervisory Board.

Sustainability-related topics are addressed through the Schaltbau Group's existing governance, risk management and reporting structures at holding, segment and entity level. According to the Group guideline on the handling of CSR (Corporate Social Responsibility) requirements, responsibility for CSR topics and sustainability reporting lies with the Management Board, supported by the CSR organisation. The Management Board is involved in the

DMA process and reviews the material topics forming the basis for the report content with regard to completeness and balance.

The CSR organisation includes the Group CSR Officer, CSR Communications, CSR managers at segment level and CSR representatives at subsidiary level. The Group CSR Officer acts as the central contact person for CSR-related topics at holding level and is responsible for the organisational implementation of the CSR requirements. As the central governance and coordination body for sustainability reporting, CSR ratings and selected Group-wide sustainability workstreams, he defines the reporting framework, coordinates the DMA and consolidation process, supports the segments and entities in data collection and validation, and prepares sustainability information for review by the Management Board and, where applicable, for information to the Supervisory Board. This central coordination is intended to ensure consistency, comparability and continuous improvement of sustainability-related information across the Group.

CSR managers and CSR representatives support the implementation of relevant sustainability topics at segment and subsidiary level.

Regular management meetings with managing directors and selected employees provide a forum for updates on non-financial information, such as the progress of internal projects and risks and opportunities related to current and future business activities. In addition, ESG-related topics are addressed in dedicated bi-monthly Management Board meetings. These meetings serve as a formal governance platform to monitor the progress of sustainability reporting, oversee the implementation of CSRD and ESRS requirements, and coordinate key sustainability-related initiatives and workstreams across the organisation.

Sustainability-related expertise is provided by the Group CSR Officer and relevant functional experts at holding, segment and entity level. Sustainability-related reporting responsibilities are organised across holding, segment and entity level.

Risk management and internal controls over sustainability reporting

The Schaltbau Group has established a group-wide governance and reporting process for sustainability reporting. Sustainability data is collected across the group at different organisational levels, depending on the nature of the respective data point. Data is gathered at holding, segment or entity level using standardised templates designed to ensure consistency and comparability. The reported information is subject to a multi-level review process. Data is first reviewed at segment level and subsequently validated and consolidated at holding level. This approach combines local data accountability with central governance and oversight.

The reporting process is supported by clearly defined roles and responsibilities, as well as plausibility checks and supporting documents requirements.

Roles and responsibilities for the reporting process are clearly defined across the Schaltbau Group. The Group CSR Officer is responsible for the overall reporting framework, including the reporting processes and tools, the validation, consolidation and preparation of sustainability information for external reporting and CSR ratings. Management at the level of the individual Group companies is responsible for the timely, complete and accurate provision of required data and information. Following consolidation and preparation at holding level, the sustainability report is subject to review and approval by the Management Board prior to publication.

The Schaltbau Group enhances its sustainability reporting process and related controls as part of the ongoing CSRD/ESRS implementation, including the further formalization of reporting definitions, evidence requirements, responsibilities and review procedures.

2. ENVIRONMENTAL INFORMATION

2.1. E1 Climate Change

Environmental protection, energy efficiency and the reduction of energy-related emissions are relevant aspects of the Schaltbau Group's environmental approach. Climate-related matters are addressed through Group-wide environmental principles, environmental management processes, site-level monitoring and selected energy-related measures.

The material impacts and risks identified for the Schaltbau Group primarily relate to greenhouse gas emissions, energy consumption, the use of renewable energy and physical climate risks.

The following section provides an overview of these material impacts and risks and describes how they are addressed through relevant policies and actions.

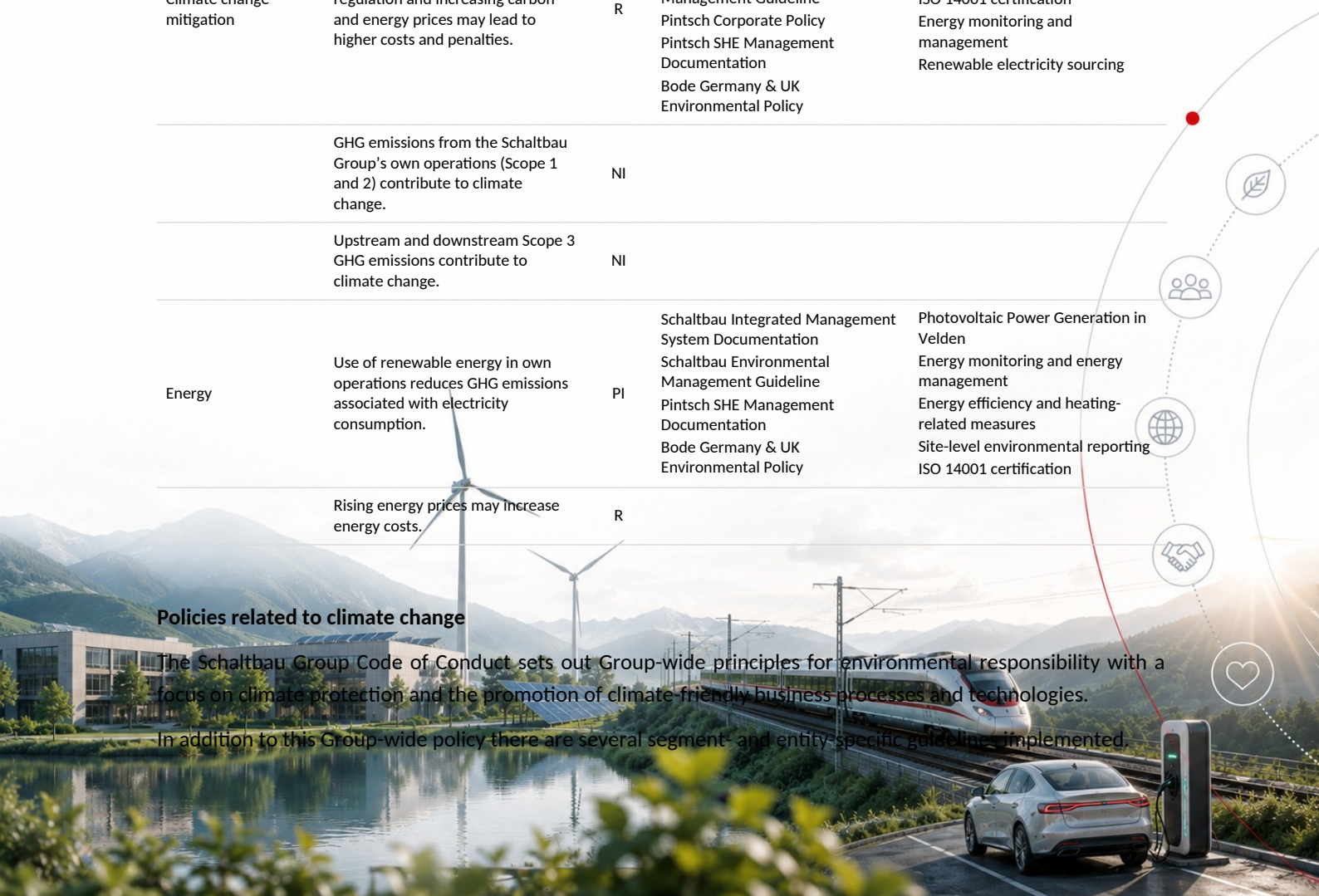
2.1.1. Impact, risk and opportunity management

Material topics	IROs	Type	Policies	Actions
Climate change adaptation	Physical climate risks may affect the Schaltbau Group's sites and supply chain infrastructure, leading to disruptions and increased costs.	R		
Climate change mitigation	Transition risks from carbon regulation and increasing carbon and energy prices may lead to higher costs and penalties.	R	Schaltbau Group Code of Conduct Schaltbau Integrated Management System Documentation Schaltbau Environmental Management Guideline Pintsch Corporate Policy Pintsch SHE Management Documentation Bode Germany & UK Environmental Policy	NExT Factory energy concept Site-level environmental reporting ISO 14001 certification Energy monitoring and management Renewable electricity sourcing
	GHG emissions from the Schaltbau Group's own operations (Scope 1 and 2) contribute to climate change.	NI		
	Upstream and downstream Scope 3 GHG emissions contribute to climate change.	NI		
Energy	Use of renewable energy in own operations reduces GHG emissions associated with electricity consumption.	PI	Schaltbau Integrated Management System Documentation Schaltbau Environmental Management Guideline Pintsch SHE Management Documentation Bode Germany & UK Environmental Policy	Photovoltaic Power Generation in Velden Energy monitoring and energy management Energy efficiency and heating-related measures Site-level environmental reporting ISO 14001 certification
	Rising energy prices may increase energy costs.	R		

Policies related to climate change

The Schaltbau Group Code of Conduct sets out Group-wide principles for environmental responsibility with a focus on climate protection and the promotion of climate-friendly business processes and technologies.

In addition to this Group-wide policy there are several segment- and entity-specific guidelines implemented.



At Schaltbau the Environmental Management Guideline specifies how environmental aspects are identified, assessed and managed, including responsibilities and measures to prevent environmental damage. At the German Schaltbau sites, the documentation of the integrated management system, which incorporates the implementation of ISO 14001, defines the structure, responsibilities and requirements for environmental management.

At Pintsch, the Corporate Policy establishes environmental protection as part of the company's management principles, while the SHE Management Documentation defines responsibilities and procedures for safety, health and environmental management. The documentation covers environmental aspects, legal obligations, measures, audits, emergency preparedness and management review.

At Bode Germany and Bode UK, the Environmental Policy defines the principles of environmental and climate management. It addresses the continuous improvement of environmental performance, the reduction of adverse impacts and the monitoring of significant environmental aspects and objectives.

Further information on the key contents, objectives, scope and referenced external standards of the relevant policies can be found in the Appendix under Policy Overview.

Targets in relation to climate change

Schaltbau Group has set a target to reduce its Scope 1 & 2 GHG emissions by 30% by 2030, using 2024 as the base year. The target reflects the company's ambition to contribute to climate change mitigation while taking into account operational and technological constraints.

To support the achievement of this target, the Group intends to implement a range of decarbonisation measures across its operations. These include, among others, the further transition of selected sites to certified renewable electricity, the implementation of energy efficiency measures in production processes, buildings, and technical equipment, and the gradual electrification of the company fleet alongside a reduction in the use of fossil fuels. In addition, the Group plans to assess and optimise or progressively decarbonise its heating systems.

Progress towards the emissions reduction target is expected to be monitored on an annual basis against the 2024 baseline. In this context, material changes in energy consumption as well as key measures implemented are intended to be documented to support transparency and enable ongoing performance tracking.

Actions and resources in relation to climate change

A cornerstone of the Schaltbau Group's sustainability concept is the NExT Factory in Velden. It applies innovative concepts to reduce the carbon footprint of its own operations. The site operates without fossil fuels in regular operations. For heating and cooling heat pumps are used, as an efficient key element of its energy supply concept. The rooftop solar array generates enough energy to make the building self-sufficient at times. A battery energy storage system and thermal storage support the on-site use of renewable electricity.

The overall concept combines a direct-current energy architecture, intelligent energy management and storage solutions. It is designed to increase the efficiency of electricity use, optimise the utilisation of self-generated energy and enable a lower-emission energy supply for production activities.

To monitor the environmental performance of such initiatives and other activities across its German sites, annual environmental reports are prepared for the locations in Munich, Velden and Aldersbach. These reports document information on energy consumption, electricity and heating use, reported greenhouse gas emissions, environmental objectives and selected improvement measures.

At Velden, the environmental report covers the fossil-free heating concept, photovoltaic generation, electricity consumption, energy costs, the planned use of green electricity and existing energy management system. At Aldersbach, the report covers site energy consumption and greenhouse gas emissions from site operations. At Munich, the report addresses electricity, heating and air conditioning as relevant energy drivers and documents energy use and related emissions at the site.

Renewable electricity sourcing and electricity mix management are further actions at selected entities and sites. At Schaltbau Germany, leased pool vehicles have been replaced with electric vehicles, and charging infrastructure has been installed. Schaltbau Germany uses electricity supply arrangements and related certificates to increase transparency on the electricity mix and, where applicable, to source renewable electricity. These actions address Scope 2 emissions from purchased electricity and contribute to reducing Scope 1 emissions related to the use of leased company vehicles under the Group's operational control.

At the German Pintsch sites, several measures are in place to continuously improve energy efficiency and reduce greenhouse gas emissions. These include the conversion to energyefficient lighting, the promotion of electromobility through the installation of charging infrastructure, and the gradual replacement of the company car fleet with electric vehicles. In addition, Pintsch consistently sources electricity from renewable energy providers to further reduce greenhouse gas emissions and contribute to the decarbonisation of the energy system.

At Bode Germany, energy-related initiatives include the continued development of energy efficiency awareness and site-level energy management. In addition, Bode plans to source green electricity to further reduce emissions associated with purchased electricity. Energy efficiency measures are supported by internal awareness activities and operational initiatives at site level. In addition, charging infrastructure has been installed and the gradual electrification of company vehicles supports the reduction of fuel-related emissions where operationally feasible.

The operational framework for environmental management, including energy- and emission-related topics, at the German sites of Bode, Pintsch and Schaltbau is ensured through an ISO 14001 compliant management system, that is implemented at all locations and subject to regular audits.

2.1.2. Metrics

Energy consumption and mix

Energy consumption in MWh	2025
(1) Total energy consumption from fossil sources	13,976.10
Share of fossil sources in total energy consumption (%)	47.6
a) Fuel consumption from coal and coal products	0
b) Fuel consumption from crude oil and petroleum products	6,586.50
c) Fuel consumption from natural gas	5,318.98
d) Fuel consumption from other fossil sources	0
e) Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	2,070.62
(2) Total energy consumption from nuclear sources	924.44
Share of nuclear sources in total energy consumption (%)	3.1
(3) Total energy consumption from renewable sources	1,123.65
Share of renewable sources in total energy consumption (%)	3.8
(4) Total energy consumption from unknown sources	13,353.41
Share of energy consumption from unknown sources	45.5
Total energy consumption	29,377.6

Share of energy sources in total energy consumption 2025



Gross Scopes 1, 2, 3 GHG emissions

GHG emissions are calculated based on the principles of the Greenhouse Gas Protocol. Where primary data was not available, appropriate average values have been used.

The Schaltbau Group has already started to expand its greenhouse gas accounting beyond Scope 1 and Scope 2 emissions. In the reporting period, initial assessments of selected Scope 3 categories were carried out based on available data and suitable estimation approaches. However, the resulting calculations are still under development and currently do not fully cover all entities and all potentially relevant Scope 3 categories.

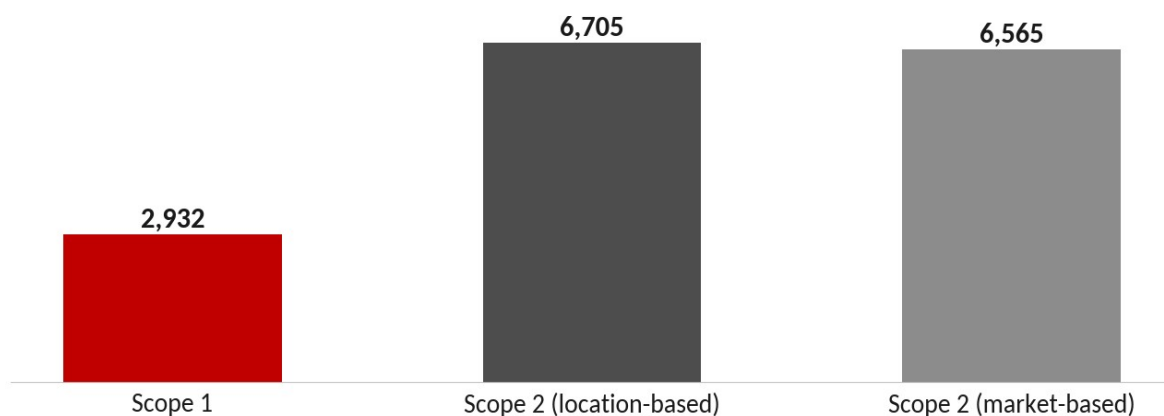
As the results are subject to significant uncertainties due to data limitations and estimation methodologies, Scope 3 emissions are not yet presented as a complete Group-wide baseline in this report. The Group intends to

gradually expand the coverage of Scope 3 categories, increase the share of primary data and further improve methodological robustness as part of the ongoing development of its climate reporting.

Based on the analyses conducted to date, Category 3.1 (Purchased Goods and Services) is expected to represent the most significant driver of Scope 3 emissions and will therefore be prioritized in further development.

	Greenhouse gas emissions (in t CO ₂ e)	2025
Scope 1 GHG emissions		
Gross Scope 1 GHG emissions (tCO ₂ eq)	2,932.02	
Scope 2 GHG emissions		
Gross location-based Scope 2 GHG emissions (tCO ₂ eq)	6,704.90	
Gross market-based Scope 2 GHG emissions (tCO ₂ eq)	6,565.24	

Gross GHG emissions 2025 (t CO₂e)



2.2. E5 Resource Use and Circular Economy

The efficient use of resources and raw materials, as well as the development of durable products, forms a key element of the Schaltbau Group's environmental approach. Related topics are addressed through Group-wide environmental principles, supplier requirements, environmental management processes and targeted operational measures across segments and sites.

Key material impacts, risks and opportunities relate to the use and extraction of primary raw materials, circular business models, waste generation and the handling of hazardous and non-hazardous waste.

The following section provides an overview of these material impacts, risks and opportunities and describes how they are addressed through relevant policies and actions.

2.2.1. Impact, risk and opportunity management

Material topics	IROs	Type	Policies	Actions
Resource inflows	Use and upstream extraction of primary raw materials contribute to the depletion of finite resources.	NI	Schaltbau Group Code of Conduct Code of Conduct for business partners	Supplier declarations, REACH/RoHS-related checks and conflict-minerals-related due diligence Schaltbau gold and silver reduction initiative
Circular economy	Circular business models can increase revenue and lead to reputational gains.	O		
Resource outflows, including waste	Waste generation and the treatment and disposal of non-hazardous waste from the Schaltbau Group's own operations may cause environmental impacts.	NI	Schaltbau Group Code of Conduct Code of Conduct for business partners Schaltbau Integrated Management System Documentation Schaltbau Environmental Management Guideline Pintsch Corporate Policy Pintsch SHE Management Documentation Bode Germany & UK Environmental Policy	Site-level waste monitoring and reporting Waste separation; recycling and disposal processes External waste collection and treatment arrangements Hazardous waste segregation and handling Internal environmental audits (ISO 14001)
	Generation and handling of hazardous waste in Schaltbau Group's own operations may cause environmental impacts.	NI		

Policies related to resource use and circular economy

As with climate change, the Schaltbau Group Code of Conduct establishes the Group-wide guiding principles for resource use by emphasizing environmental protection and the responsible use of natural resources.

Building on this, the Code of Conduct for business partners defines supplier requirements for responsible sourcing and material compliance in the upstream value chain. It addresses legal material requirements, prohibited or restricted substances, conflict minerals and the responsible use of raw materials and natural resources. Business partners are required to disclose relevant substances and, where applicable, establish due diligence processes for tin, tungsten, tantalum, gold and further raw materials such as cobalt. It also addresses the handling of waste and hazardous substances in the upstream value chain and requires business partners to ensure environmentally sound collection, storage and disposal of waste.

Within its own operations, resource outflows and waste are managed through environmental management systems and environmental policies at selected segments and sites.

At Schaltbau, the Integrated Management System Documentation and the Environmental Management Guideline define how environmental aspects such as waste, materials and operational resource use are identified, assessed and managed. In addition, the Corporate Guideline on Waste and Hazardous Substances Management establishes clear roles, responsibilities and procedures for the safe and compliant handling of waste and hazardous substances.

At Pintsch, the Corporate Policy and the SHE Management Documentation address environmental protection, responsible resource use and the management of operational environmental aspects, including waste, materials and legal obligations.

At Bode Germany and Bode UK, the Environmental Policy defines the principles of environmental management and continuous improvement. Waste-related work instructions define the operational implementation of waste

segregation and handling at site level.

Further information on the key contents, objectives, scope and referenced external standards of the relevant policies can be found in the Appendix under Policy Overview.

Actions and resources related to resource use and circular economy

Resource inflows

The Schaltbau Group addresses resource inflows through various transparency and compliance measures relating to its suppliers, as well as through selected optimisation measures in material sourcing. Supplier declarations, REACH/RoHS-related checks and conflict-minerals-related due diligence are used to implement material requirements and increase transparency over relevant materials and substances entering Schaltbau products.

At Schaltbau, a material optimisation initiative focuses on reducing the use of gold and silver in selected components. The initiative covers defined product groups and material numbers and assesses where material use can be reduced without compromising product performance. Measures include reducing contact dimensions or coating thicknesses, replacing or optimising material use and performing technical tests before implementation.

These actions contribute to more resource-efficient product design and manufacturing where Schaltbau can influence material specifications in its own products and components. By targeting selected precious metals, the actions aim to reduce material intensity where technically feasible.

Resource outflows

Waste-related actions focus on waste separation, monitoring, recycling and the proper handling of hazardous and non-hazardous waste. They are implemented through site-level responsibilities, operational procedures and environmental management processes.

The environmental management systems in accordance with ISO 14001 implemented at the Schaltbau sites in Germany, France, India and UK, as well as at the German Pintsch and Bode sites, also cover resource use and waste management. They include, among other elements, systematic monitoring and documentation of waste volumes, the definition of site-level targets to improve performance, and measures to promote the efficient use of resources.

At the Schaltbau site in Velden, waste management includes the separation and monitoring of hazardous and non-hazardous waste streams, defined disposal and recycling routes and the follow-up of waste-related improvement objectives. Internal environmental audits cover waste separation, disposal, hazardous substances, environmental objectives and consumption data.

At Bode, site-level instructions define the separation and handling of hazardous and non-hazardous waste. They cover detailed waste fractions such as adhesive and sealant containers, spray cans, oil-contaminated operating materials, residual waste, packaging material, paper and cardboard.

At Pintsch, waste management also includes the separation and monitoring of hazardous and non-hazardous waste streams as well as defined disposal and recycling routes. Site-specific procedures cover relevant waste fractions, including hazardous operating materials, residual waste, packaging material, paper and cardboard, and support the consistent handling of waste across operations.

These actions provide operational control over resource outflows and waste streams. They address segregation, disposal and recycling of waste and reduce the risk of improper handling of hazardous and non-hazardous waste.

2.2.2. Metrics

Resource inflows

The Group's key materials are primarily technical materials used in its products and manufacturing processes. These include steel and stainless steel, aluminium, copper, plastics, glass and electrical or electronic components. They form the basis of the Group's product and manufacturing profile and are used through structural, mechanical, electrical and sealing-related applications.

Depending on the segment and product portfolio, the Group also uses selected precious, scarce or application-specific materials, including silver and gold in certain technical applications as well as specific magnet- or electronic-related inputs. The Group's overall material profile therefore combines core industrial materials with selected materials that are particularly relevant because of their technical properties, value or availability.

Across the Schaltbau Group, the composition of materials used in products differs only marginally between segments. From a Group-wide perspective, key materials comprise steel, aluminium, plastics, copper and other electronic components. For the Bode segment, glass represents an additional material of particular relevance due to its importance in door manufacturing. In the Schaltbau segment, selected precious metals, especially gold and silver, also play a material role given their use in specific components and applications.

In selected cases, the Group's key materials or components also include materials that are relevant in the context of critical raw materials or strategic raw materials, particularly in electronic, magnet-related or aluminium-related applications. These aspects are addressed within the Group's broader approach to responsible sourcing, material compliance and resource use.

Resource outflows

Waste generated in the Schaltbau Group's own operations mainly results from manufacturing, assembly, maintenance, logistics and administrative activities. The Group's waste profile is largely driven by non-hazardous waste streams from production and packaging activities.

The main waste streams include metal-related waste, such as scrap metal, shavings, iron and steel scrap, non-ferrous metals, copper, brass and aluminium. This kind of waste reflects the Group's manufacturing activities and generally has high recycling potential. Further relevant non-hazardous waste streams include paper and cardboard, wood and wood-based packaging, plastic films and other plastic waste, commercial and office waste, as well as other packaging materials generated in logistics and administrative processes.

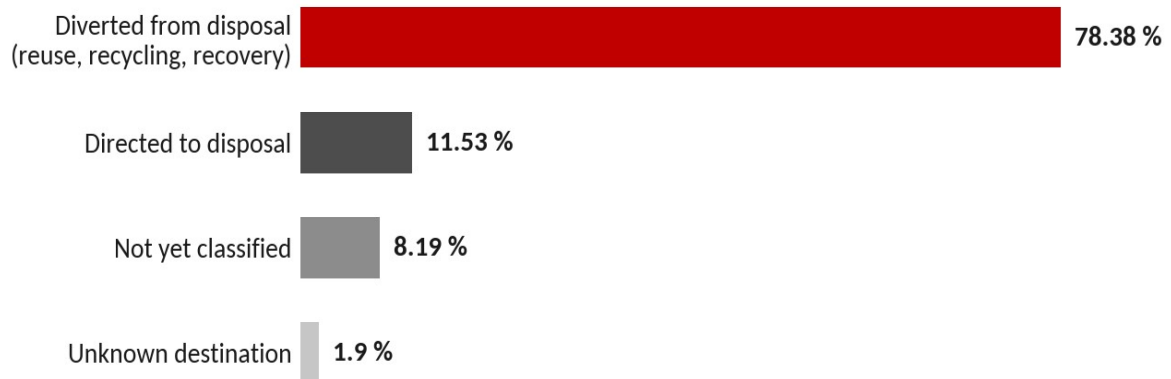
In addition, the Schaltbau Group generates smaller volumes of hazardous and separately collected waste streams, depending on the respective site and activity profile. These may include adhesive and sealant waste containing organic solvents, solvents, oily operating materials, emulsions, inks, batteries, fluorescent tubes, contaminated packaging, electronic scrap, cables and other electrical or electronic components. Such waste streams are collected separately and transferred to external waste management providers in accordance with applicable local requirements.

Waste streams differ by segment and site, reflecting the respective activity profiles of the Schaltbau, Bode and Pintsch segments. Manufacturing sites generally generate a higher proportion of metal, production and packaging waste, while administrative or non-operational sites generate limited waste volumes or are not relevant for operational waste reporting.

The following table provides an overview of the Group's waste generation and waste management performance for the reporting period.

Waste category ¹	Hazardous waste, t	Non-hazardous waste, t	Total, t	Share of total waste, %
Total waste generated	150.83	1,908.31	2,059.14	100%
Waste diverted from disposal – preparation for reuse	2.13	6.84	8.97	0.44%
Waste diverted from disposal – recycling	6.63	1,585.24	1,591.87	77.31%
Waste diverted from disposal – other recovery operations	0.35	12.83	13.18	0.64%
Total waste diverted from disposal	9.11	1,604.91	1,614.02	78.38%
Waste directed to disposal – incineration	57.22	69.90	127.12	6.17%
Waste directed to disposal – landfill	3.20	-	3.20	0.16%
Waste directed to disposal – other disposal operations	33.05	74.00	107.05	5.20%
Total waste directed to disposal	93.47	143.90	237.37	11.53%
Waste with unknown final destination	-	39.19		1.90%
Radioactive waste	-			
Waste not yet classified by treatment route	48.24	120.31	168.56	8.19%

Waste by treatment route 2025 — share of total waste



¹ The figures include measured data and extrapolated amounts. The calculation is based on waste data reported by the relevant entities and, where applicable, supporting documentation from waste management providers or site-level waste records. Where measured waste data was not available for selected operational entities, waste volumes were extrapolated based on employee numbers using segment-specific waste intensity factors derived from comparable entities with available waste data. Treatment routes were classified based on available waste management documentation. Where the final treatment route could not be reliably determined, the respective amounts were reported as waste with unknown final destination. Figures are rounded to two decimal places.

3. SOCIAL INFORMATION

3.1. S1 Own workforce

The Schaltbau Group's own workforce constitutes a fundamental and indispensable element of its value creation, contributing skills, experience and commitment to the Group's long-term success. Accordingly, the protection of human and labour rights is embedded as a core principle of responsible corporate conduct. Diversity, equal treatment and non-discrimination are integral to the Group's understanding of corporate culture and leadership. In addition, the Schaltbau Group maintains strict standards across its operations regarding the prohibition of child labour, forced labour and human trafficking.

The results of the double materiality assessment confirm the relevance of these aspects, identifying a healthy and fair working environment, freedom of association, protection against discrimination and harassment, and the respect for human rights as material topics for the Schaltbau Group, as outlined in the following section.

3.1.1. Impact, risk and opportunity management

Material matter	IROs	Type	Policies	Actions
Own workforce: Working conditions (incl. social dialogue, freedom of association, works councils, participation rights of workers, collective bargaining)	Denial of freedom of association and worker participation rights may lead to human and labor rights violations and employee dissatisfaction.	NI	Schaltbau Group Code of Conduct Rules of Procedure for Complaints Entity-specific employee handbooks and policies	Commitment to social dialogue, collective bargaining & freedom of association Whistleblower- system
	Denial of collective bargaining may lead to violations of worker rights and dissatisfaction in the workforce.	NI		
Own workforce: Working conditions & Health & Safety (incl. adequate wages, work-life balance, working time, secure employment, social protection)	Long-term physical strain and work environment-related exposure may negatively affect employees' health.	NI	Schaltbau Group Code of Conduct Pintsch Corporate Policy Pintsch SHE Management Documentation Entity-specific employee handbooks and policies	Regular meetings with occupational health & safety officers Regular dialogue with works councils ISO 45001 certification Occupational health management systems First aid & safety trainings
	Insufficient prevention measures may lead to adverse health effects such as fatalities and workplace injuries or illnesses caused by manufacturing activities.	NI		
	Unsuitable working conditions (e.g. workload) can negatively impact own workforce's mental health.	NI		
Own workforce: Diversity and equal treatment	Impact on equal treatment and diversity resulting from insufficient inclusion and equal opportunity within the workforce.	NI	Schaltbau Group Code of Conduct Entity-specific employee handbooks and policies	Prevention and Remediation of discrimination and harassment Training and awareness programs
Own workforce: Other labour-related human rights (incl. Child labour, forced labour, privacy and adequate housing, water and sanitation)	The occurrence of child labour results in legal exposure and reputational damage, leading to potential fines, litigation costs and adverse impacts on stakeholder trust.	R	Schaltbau Group Code of Conduct Declaration of principles (German Supply Chain Due Diligence Act) Rules of Procedure for Complaints	Training on child labour risk Whistleblower- system

The term “own workforce” refers to all employees and non-employees working for a consolidated Schaltbau Group entity, irrespective of whether their engagement is temporary or permanent, or whether they work on a full-time or part-time basis. Nonemployees may include workers provided by employment agencies as well as selfemployed individuals.

Engagement with own workforce and workers’ representatives, existence of channels for own workforce to raise concerns and approaches to remedy

Schaltbau Group systematically engages with its workforce and workers’ representatives to integrate employee perspectives into decisions and activities related to social and human rights impacts. German entities with significant employment numbers have established employee representative bodies, which serve as key instruments for transparency, co-determination, and structured direct and indirect communication with the workforce. Beyond this, open and constructive dialogue with relevant trade unions in the environment of the individual entities is accorded with high priority.

In addition to these formal representation structures, Schaltbau Group maintains several decentralised channels through which employees receive information and can raise concerns at entity-level. These include regular work meetings and general information events, which facilitate transparent communication on business developments and workplace topics. Furthermore, noticeboards are used to share relevant updates and encourage employee feedback. Regular team interactions and targeted training particularly on health and safety provide further opportunities for dialogue, clarification of expectations and early identification of potential issues.

The Group pays particular attention to understanding the perspectives of vulnerable or marginalised groups within the workforce. Representation structures are available in German sites, including representatives for employees with disabilities and young workers, ensuring that specific needs and concerns of these groups are heard and considered in decision-making.

In addition, a whistleblowing system is available to all staff, particularly those who may be vulnerable or marginalised. Complaints can be submitted through

various channels, including written submissions and an online whistle-blower system. The procedure safeguards confidentiality and explicitly protects complainants and persons affected by reports from retaliation. After a complaint is received, acknowledgement is provided within a defined period, the admissibility and relevance of the complaint are assessed, and, where needed, further information is requested. Cases within scope are investigated by impartial, specially trained staff under the oversight of the Human Rights Officer and Compliance function. The effectiveness of the whistleblowing system is reviewed at least annually and ad hoc when the risk situation changes, and insights from complaints and their handling are incorporated into the Group’s broader risk management and preventive measures.

Schaltbau Group does not maintain global framework agreements with trade unions or global union federations. However, it is subject to collective bargaining agreements for the majority of employees in Germany and for a significant proportion of the workforce across the Group. In this way, labour and human rights practices are aligned with internationally recognised standards, including the ILO core labour standards and the principles of the UN Global Compact. These standards, together with the Group’s Code of Conduct and human rights strategy, constitute the binding framework for safeguarding workers’ rights in all entities of Schaltbau Group.

Policies related to own workforce

Schaltbau Group maintains a binding social policy framework that governs labour and human rights across the corporate group. This framework, comprising the Schaltbau Group Code of Conduct and several policies implementing the German Supply Chain Due Diligence Act, is designed to prevent, identify and mitigate severe human rights violations, to safeguard affected workers and communities, and to limit associated legal and reputational risks.

Central to this framework for the own workforce is the Schaltbau Group Code of Conduct. It sets out binding legal, social and ethical principles for all business activities, with the objectives of ensuring compliance with applicable laws, safeguarding human rights, and promoting integrity, transparency and occupational health and safety. The Code is aligned with key international labour standards and initiatives, in particular the conventions and guidelines of the United Nations and the International Labour Organization (ILO). It is reviewed on a regular basis and updated where necessary to reflect evolving legal requirements and stakeholder expectations.

In addition, Schaltbau Group has adopted a declaration of principles in conjunction with its own workforce. This document sets out the Group's responsibility for respecting human rights across its operations and describes the related governance structure, including the roles of the Executive Board and the Human Rights Officer. The policy on rules of procedure for complaints defines and regulates the whistleblowing system, which is described in the previous chapter, and provides affected persons with a structured and accessible channel for raising concerns.

Beyond Group-wide documents, several additional policies at entity level address central workforce-related topics and operationalise the overarching framework. In the German Pintsch and Bode entities, as well as in the Italian and Indian Schaltbau sites, these policies at the same time define the guidelines for implementing the occupational health and safety management system in line with ISO 45001. At Pintsch, the Corporate Policy sets out key conditions for occupational safety and responsible conduct. Building on this, the Pintsch SHE Management Documentation translates these requirements into operational practice by specifying responsibilities, processes and procedures in detail. At Bode, entity-specific Health & Safety Workplace Policies provide the framework for workplace safety and health protection at site level, outlining basic principles and responsibilities.

In addition, further entities within the Group maintain their own local policies and employee handbooks, for example in the United States and the United Kingdom. These documents set out site-specific rules, processes

and guidance for the workforce, in line with applicable local requirements.

Actions and resources related to own workforce

Commitment to constructive social dialogue, the right to collective bargaining and freedom of association is firmly embedded in the Schaltbau Group's Code of Conduct. The Group maintains an open, respectful and solution-oriented exchange with its employees and, where applicable, their employee representatives, both in EU Member States and in countries outside the EU. At sites with significant employment in Germany, elected work councils are in place. These bodies hold regular meetings, address current topics and operational issues, and maintain close dialogue with the respective management teams.

To strengthen awareness of work-related rights, Schaltbau Group implements targeted trainings on child labour risks and related procurement requirements. In parallel, particular importance is attached to the prevention of discrimination and harassment. These topics are addressed in training programs and internal communication formats, ensuring that employees at all hierarchical levels are sensitised to human rights risks and expected standards of conduct.

Occupational health and safety are managed through structured management systems. For German Bode and Pintsch entities, as well as for Schaltbau Italy, Schaltbau India and Bode UK these are aligned with the ISO 45001 standard. The ISO 45001 certifications are renewed on an annual basis to ensure ongoing compliance and continuous improvement.

At Schaltbau Germany, occupational health and safety are supported by regular quarterly meetings with occupational safety officers and company doctors, enabling systematic review of workplace conditions, risks and preventive measures.

Health and safety activities are organised at the level of individual entities, considering site-specific risks and regulatory requirements. Measures include structured health management programmes, preventive occupational medical services, and targeted initiatives on accident prevention and stress management. In addition, dedicated safety and first-aid trainings are conducted to strengthen employees'

awareness of applicable health and safety requirements.

These measures aim to foster a strong safety culture and promote safe behaviour in day-to-day operations.

Their effectiveness is monitored through regular exchanges with occupational safety officers and structured review cycles, including periodic recertification audits under ISO 45001.

3.1.2. Metrics

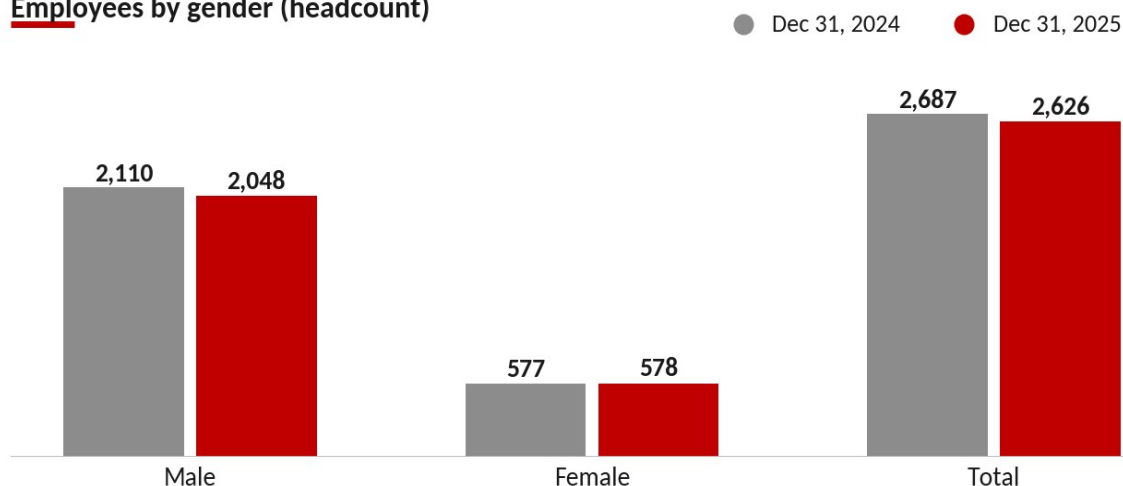
Employee characteristics of Schaltbau Group

Employee data is collected at entity level and consolidated for sustainability reporting purposes. The figures presented below are reported in headcount as of 31 December 2025 and for the comparative period as of 31 December 2024. Employees are individuals with an employment contract with a Schaltbau Group entity and included in the respective entity's payroll. The reported figures include full-time and part-time employees, employees on permanent or fixed-term contracts, apprentices, trainees and paid interns with an employment contract, as well as employees on paid or unpaid leave. External consultants, contractors, agency workers, self-employed individuals, outsourced service providers, unpaid interns and members of supervisory or non-executive boards without an employment contract are excluded.

Employees by gender²

(in headcount)	Dec 31, 2025	Dec 31, 2024
Male	2,048	2,110
Female	578	577
Other / not reported	0	
Total	2,626	2,687

Employees by gender (headcount)

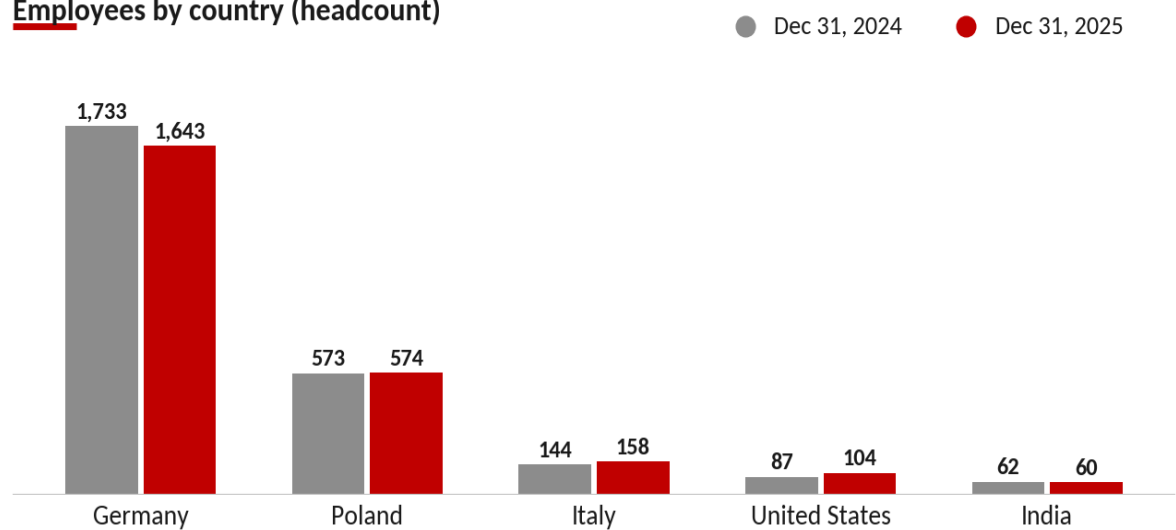


² For Schaltbau Italy, the gender split was derived pro rata from available local gender data and reconciled to the Italy headcount used for reporting.

Employees in countries with significant employment

(in headcount)	Dec 31, 2025	Dec 31, 2024
Germany	1,643	1,733
Poland	574	573
Italy	158	144
United States	104	87
India	60	62
Total	2,539	2,599

Employees by country (headcount)



Employees by contract type, broken down by gender

(in headcount)	Dec 31, 2025	Dec 31, 2024
Number of permanent employees ³	2,597	2,656
Number of temporary employees	29	31
Number of non-guaranteed hours employees	0	
Total	2,626	2,687

The employee turnover figure is based on entity-level information collected for the reporting period. In 2025, Schaltbau Group recorded 262 employees leaving the Group, which represent 10%. Leaves are defined, in line with ESRS, as the number of employees who leave the company voluntarily or due to dismissal, retirement, or death in service.

Characteristics of non-employees in the undertaking's own workforce

In addition to the employee headcount figures presented above, Schaltbau Group reports non-employees separately. Non-employees are excluded from the employee headcount tables and disclosed separately to reflect

³ For Schaltbau Italy, the adjusted headcount used for reporting was treated as permanent employees.

external workforce arrangements where applicable. As of 31 December 2025, Schaltbau Group had 60 non-employees.

Collective bargaining coverage and social dialogue

Schaltbau Group reports collective bargaining coverage and social dialogue for EEA countries with significant employment, defined as countries with more than 50 employees that are among the ten largest countries by employee headcount. Outside the EEA, collective bargaining coverage is presented by region.

Collective bargaining coverage is calculated based on the number of employees covered by collective bargaining agreements divided by the total number of employees in the respective country or region. Social dialogue is reported based on the share of employees covered by workplace representation in the relevant EEA countries. Based on available documentation, 61.5% of Schaltbau Group employees were covered by collective bargaining agreements in the reporting period.

Coverage rate	Collective bargaining coverage Employees - EEA	Collective bargaining coverage Employees - non-EEA	Social dialogue Workplace representation (EEA only)
0-19%	Poland	Americas; Asia; non-EEA Europe	Poland
80-100%	Germany		Germany
Not reported	Italy		Italy

Diversity metrics

For the purposes of reporting gender distribution at top management level, Schaltbau Group defines two management levels. Level 1 comprises the CEOs or managing directors of the respective segments and consolidated entities. Level 2 comprises managers who report directly to the respective Level 1 executives. As of 31 December 2025, Level 1 comprised 24 managers, of whom 4 were female and 20 were male. This corresponds to a female share of 17%. Level 2 comprised 93 managers, of whom 15 were female and 78 were male, corresponding to a female share of 16%. In total, 2 top management positions are held by employees belonging to minority or disadvantaged groups.⁴

The Schaltbau Group operates in a technical industrial environment in which the availability of female talent in certain technical functions remains structurally limited. Nevertheless, the Group aims to promote equal treatment and non-discrimination in all employment-related decisions and to strengthen awareness of diversity and inclusion across the organisation. Measures include internal communication, training and local initiatives to support equal opportunities, as well as continued efforts to position Schaltbau as an attractive employer for diverse talent.

Adequate wages

Based on the information available for the reporting period, Schaltbau Group has not identified indications that employees are paid below applicable statutory minimum wage requirements. For certain countries and employee groups, the documentation of adequate wage benchmarks is still being further developed.

⁴ "Minority or disadvantaged groups" refers to employees who belong to one or more of the following categories: persons with officially recognised disabilities; employees with a migration background or foreign nationality where they represent a minority in the national workforce; or employees belonging to ethnic or religious minorities recognised in the country of operation.

Training and skills development metrics

Formalised performance and career development reviews are defined in line with ESRS as documented reviews based on criteria known to the employee and their supervisor. The percentage is calculated using the employee headcount as the denominator.

In 2025, 87% of the Schaltbau Group's employees participated in a formalised performance and career development review. The figure is based on entity-level data collected for the reporting period.

Health and safety metric

Schaltbau Group monitors occupational health and safety across its operations. The following metrics cover health and safety management system coverage, work-related fatalities, recordable accidents, work-related ill health and days lost in the reporting period. Metrics based on employees only are indicated accordingly.

The Group uses health and safety metrics to identify prevention priorities and to monitor the effectiveness of occupational health and safety measures. Where accidents occur, root-cause analyses are performed at entity level and corrective measures are defined. Health and safety activities are organised locally to reflect site-specific risks and regulatory requirements, while Group-level reporting supports transparency and comparability. The Group intends to further harmonise definitions and reporting processes for health and safety data across entities to improve comparability and support more targeted prevention measures.

The rate of recordable work-related accidents is calculated as the number of recordable work-related accidents divided by total hours worked and multiplied by 1,000,000.

Health and Safety metrics	Fiscal year 2025
Percentage of employees covered by a health and safety management system based on legal requirements and/or recognised standards or guidelines	98%
Number of fatalities as a result of work-related injuries and work-related ill health (own workforce)	0
Number of fatalities as a result of work-related injuries	0
Number of fatalities as a result of work-related ill health	0
Number of recordable work-related accidents (own workforce) ⁵	85
Rate of recordable work-related accidents based on employee hours worked ⁶	21.02
Number of days lost due to work-related injuries and work-related ill health (employees)	1,163

Work-life balance metrics

Schaltbau Group employees are entitled to family-related leave in accordance with applicable national legal requirements and local employment regulations. Based on the available entity-level information, 100% of employees were considered entitled to take family-related leave as of 31 December 2025.

⁵ For Schaltbau Italy, recordable work-related accidents were not tracked separately for the reporting period and are therefore not included in the reported accident count.

⁶ For Schaltbau India, Italy and North America and non-employees, hours worked were estimated using the Schaltbau Germany/Austria average hours per employee and assuming full-time employment for estimation purposes.

3.2. S2 Workers in the value chain

Respect for human rights and fair working conditions in the value chain forms a core element of the Schaltbau Group's sustainability and compliance approach. Expectations for workers at suppliers and other business partners are defined through Group-wide human rights and labour standards, the Code of Conduct for Business Partners, and a risk-based due diligence system in line with the German Supply Chain Due Diligence Act and other relevant regulations.

Material impacts, risks and opportunities mainly concern human rights and labour-related issues in upstream supply chains, such as risks of child and forced labour, particularly in high-risk sectors and regions.

The following section outlines these material impacts, risks and opportunities and sets out how they are managed through policies, supplier requirements, due diligence processes and complaint and remediation mechanisms.

3.2.1. Impact, risk and opportunity management

Material topics	IROs	Type	Policies	Actions
Workers in the value chain: Working conditions (incl. adequate wages, work-life balance, working time, secure employment, social protection)	Lack of secure employment, for example through zero-hour contracts, may lead to income volatility and job insecurity for workers in the value chain.	NI	Declaration of principles (German Supply Chain Due Diligence Act) Policy for Implementation of the German Supply Chain Due Diligence Act Code of Conduct for business partners Schaltbau Code of Conduct	Due diligence and monitoring of suppliers Whistleblower- system
	Excessive or non-compliant working hours may adversely affect the physical and mental health of workers in the value chain.	NI		
	Inadequate occupational health and safety measures may expose workers in the value chain to increased risks of work-related injuries and illnesses.	NI		
Workers in the value chain: Other labour-related human rights (incl. Child labour, forced labour, privacy and adequate housing, water and sanitation)	Child labour in the value chain may adversely impact children's rights, well being and development.	NI	Declaration of principles (German Supply Chain Due Diligence Act) Policy for Implementation of the German Supply Chain Due Diligence Act Code of Conduct for business partners Schaltbau Code of Conduct	Due diligence and monitoring of suppliers Whistleblower- system
	The use of forced or compulsory labour in the value chain constitutes a violation of fundamental labour rights.	NI		

Engagement with value chain workers, existence of channels for value chain workers to raise concerns and approaches to remedy

Schaltbau Group integrated the engagement with workers in the value chain in its risk-based supply chain due diligence system, covering direct and, where relevant, indirect suppliers.

Workers in the value chain may raise concerns through the Group's whistleblowing system (for further details on the whistleblowing system see S1 & G1). Schaltbau Group conducts structured human rights risk analyses on country- and sector-specific risk indicators with consideration of vulnerable or marginalised groups. The grievance

mechanism and the insights from risk analyses and supplier assessments support the identification of risk situations and informs the design and adaptation of preventive measures and supplier engagement.

Where Schaltbau Group causes or contributes to material negative impacts on workers in the value chain, a structured remediation process applies. Reported cases are assessed by the responsible function and, where a violation is confirmed, appropriate corrective measures are defined and implemented without undue delay.

Where immediate remediation is not feasible, a documented action plan is developed in consultation with the supplier, setting out responsibilities, timelines and measures to prevent, cease or mitigate the adverse impact. Implementation and effectiveness are monitored. In case of ineffective remediation or severe or persistent violations, escalation measures are considered up to and including suspension or termination of the business relationship as a last resort.

All remediation steps are documented and systematically fed back into the continuous improvement of the Group's due diligence processes.

Policies related to value chain workers

Schaltbau Group maintains a structured policy framework addressing impacts on workers in the value chain, including the Group Code of Conduct, a Code of Conduct for business partners and governance procedures implementing the German Supply Chain Due Diligence Act. These policies address material social impacts and risks as well as support compliance with legal requirements.

They explicitly address and prohibit child labour, trafficking in human beings, and forced or compulsory labour, and define minimum standards on working conditions, nondiscrimination and occupational health and safety. The policies apply across the Group's own operations and its global upstream value chain. The Code of Conduct for business partners is binding for direct suppliers and requires the cascading of its provisions to subcontractors, with a focus on high-risk industries and geographies and on vulnerable stakeholder groups such as children, migrant workers and agency workers.

The policy framework is aligned with internationally recognised standards and initiatives, including the ILO standards, and is designed to comply with the German Supply Chain Due Diligence Act and other relevant regulations. Stakeholder interests are considered through risk-based human rights and environmental assessments and a formal grievance mechanism accessible to workers in the value chain and other stakeholders.

Actions and resources related to value chain workers

Suppliers are generally required to acknowledge and contractually accept the Code of Conduct for business partners and to cascade these requirements to their own subcontractors. This applies particular in suppliers operating in high-risk countries, sectors or with significant purchasing volumes.

Based on the identified risk level, Schaltbau Group implements additional preventive and mitigating measures, such as supplier self-assessments, targeted inquiries, on-site visits and, where appropriate, training and awareness-raising for procurement staff and suppliers.

No incidents or material violations related to workers in the value chain were identified in the reporting year.

Nevertheless, grievance mechanisms and remediation processes are established and can be activated where required.

The effectiveness of actions is monitored through regular risk analyses and ongoing supplier risk screening, as well as through indicators such as the contractual integration of the Code of Conduct for business partners, results of supplier assessments and audits, and findings from grievance mechanisms and internal reviews.

The Human Rights Officer and responsible functions assess whether identified risks are reduced over time, whether corrective actions are implemented as planned, and whether further measures are required. The results are incorporated into the continuous improvement of due diligence processes and supplier management.

The expected outcomes of these actions include prevention and mitigation of risks related to child and forced labour, unsafe working conditions and other human rights violations in the value chain. By embedding human rights requirements into supplier relationships, Schaltbau Group aims to strengthen respect for workers' rights and enhance transparency in the supply chain.

4. GOVERNANCE INFORMATION

4.1. G1 Business Conduct

Lawful and responsible business conduct is fundamental to Schaltbau Group's relationships with employees, customers, suppliers, business partners, and other stakeholders.

Schaltbau Group's material business conduct impacts and risks primarily related to corporate culture, corruption and bribery, whistleblower protection, cybersecurity, supplier relations, and payment practices.

The following section provides an overview of these material impacts and risks and describes how they are managed through Schaltbau Group's governance, compliance, and control frameworks. This includes information on relevant companywide policies, actions, targets, and metrics.

4.1.1. Impact, risk and opportunity management

Material topics	IROs	Type	Policies	Actions
Corporate culture incl. anti-corruption and bribery, protection of whistle-blowers and animal welfare	Non-compliance with existing and upcoming regulations, laws and tariffs leads to reputational and regulatory risks.	R	Schaltbau Group Code of Conduct Group Compliance Guideline Money Laundering Prevention Policy Guideline on Invitations and Gifts Rules of Procedure for Complaints	Compliance trainings Compliance organisation and reporting lines Preventive and event-driven compliance audits Whistleblower- system
Corporate culture incl. anti-corruption and bribery, protection of whistle-blowers and animal welfare	Cyber-attacks on IT infrastructure may cause system disruptions, leading to operational downtime and financial and reputational damage.	R	Schaltbau Corporate Guideline on Information Security Bode Germany - Declaration on Information Security Bode Germany - Policy on Information Security Bode Germany - Corporate Guideline Cybersecurity Requirements Bode Germany - Information Security Guideline for Suppliers and Contractors Pintsch Information Security Declaration Pintsch Guideline on Classification and Labeling of Information Pintsch Guideline on information security Pintsch Guideline on Vulnerability Management Pintsch Guideline on information security incidents	Security enhancements across data networks Backup concepts Cyber awareness trainings IT policy and governance review planned incident response improvements
Corporate culture incl. anti-corruption and bribery, protection of whistle-blowers and animal welfare	Incidents of corruption and bribery within own operations may negatively affect business partners and other stakeholders.	NI	Schaltbau Group Code of Conduct Group Compliance Guideline Guideline on Donations, Sponsoring and Memberships Guideline on Invitations and Gifts Guideline for Consultants Guideline for Distributors and Commercial Agents	Anti-corruption and anti-bribery trainings Refresher trainings for risk-exposed functions Approval and documentation requirements for benefits and intermediaries Due diligence for distributors, commercial agents and consultants Whistleblowing and investigation procedures

Material topics	IROs	Type	Policies	Actions
Corporate culture incl. anti-corruption and bribery, protection of whistle-blowers and animal welfare	Insufficient internal controls and compliance frameworks may result in fraud, corruption, regulatory violations and associated financial and reputational damage.	R	Schaltbau Group Code of Conduct Group Compliance Guideline Money Laundering Prevention Policy Guideline on Donations, Sponsoring and Memberships Guideline on Invitations and Gifts Rules of Procedure for Complaints	Compliance organisation at Group and segment level Documented compliance training Compliance audits Internal audits Structured business partner due diligence investigation and corrective measures
Management of relationships with suppliers incl. payment practices, especially late payment to small- and medium-sized undertakings	Negative supplier management practices (e.g. late payments) may undermine suppliers' economic stability and contribute to poor working conditions.	NI	Code of Conduct for business partners	Code of Conduct for business partners integration German Supply Chain Due Diligence Act clauses Supplier self-assessments Procurement ESG training Management of payment practices through procurement and finance processes
Management of relationships with suppliers incl. payment practices, especially late payment to small- and medium-sized undertakings	Inadequate supplier relationship management may result in supply chain disruptions, loss of key suppliers and reputational damage.	R	Code of Conduct for business partners Guideline on Donations, Sponsoring and Memberships Guideline on Invitations and Gifts	Risk-based supplier assessments Supplier onboarding requirements Follow-up for higher-risk suppliers Documentation and tracking of supplier obligations and risk classifications

Policies related to business conduct

Policies related to corporate culture, corruption and bribery and whistleblower protection

The Schaltbau Group's Code of Conduct forms the foundation of its business conduct framework. It defines binding principles for lawful and ethical conduct including integrity, responsibility, reliability, trust and mutual respect and prohibits corruption and bribery in business transactions. The Group Compliance Guideline complements this framework by defining the compliance organisation, roles and responsibilities, and core processes for preventing and addressing legal violations.

Dedicated policies further specify the Schaltbau Group's requirements for corruption and bribery prevention in selected risk areas. The Money Laundering Prevention Policy addresses financial crime risks through risk-based customer and transaction due diligence, sanctions screening, documentation and reporting duties. The Guideline on Donations, Sponsoring and Memberships governs monetary and in-kind contributions to external organisations and events. The Guideline on Invitations and Gifts regulates the offering and acceptance of business courtesies. The Guideline for Distributors and

Commercial Agents and the Guideline for Consultants set requirements for the engagement and monitoring of third parties that may act on behalf of, or provide services to the Schaltbau Group.

The Schaltbau Group has policies in place that are intended to be consistent with key anti-corruption requirements, including the UN Convention against Corruption. Corruption and bribery risks may arise in particular in functions and roles that interact with customers, suppliers, distributors, commercial agents, consultants, public officials or other external business partners, and in processes involving benefits, donations, sponsoring, memberships or intermediary arrangements.

Furthermore, the Schaltbau Group also maintains a whistleblowing and complaints framework based on the Code of Conduct, the Group Compliance Guideline and the guideline Rules of Procedure for Complaints.

Cyber Security related policies

Information security and cybersecurity are governed through segment-specific frameworks. Schaltbau, Bode and Pintsch each apply dedicated policies and guidelines covering information security and cybersecurity, including supplier and product-related requirements.

These frameworks aim to ensure the security, integrity and availability of information and IT systems and to mitigate risks such as unauthorised access, data loss, system outages and misuse of IT resources.

Supplier Relationship Management and payment practices related policies

Requirements for responsible business conduct in supplier and business partner relationships are defined in the Code of Conduct for business partners. The document sets minimum expectations regarding legal compliance, human rights, labour standards, occupational health and safety, environmental protection, complaints mechanisms and responsible sourcing. The policy supports responsible procurement and the management of business conduct risks in the upstream value chain. It also sets expectations for business partners to promote the defined standards within their own supply chains, where applicable.

Further information on the key contents, objectives, scope, and referenced external standards of the relevant policies can be found in the Appendix under Policy Overview.

Actions and resources related to business conduct

Schaltbau Group implements actions related to business conduct to prevent, detect and address risks connected to corruption and bribery, corporate culture, whistleblower protection, cybersecurity and supplier relationships.

Corruption & Bribery related actions

Schaltbau Group raises awareness of corruption and bribery risks through compliance training. These trainings cover applicable legal requirements, internal codes of conduct, and provide practical guidance on recognising and avoiding corrupt behaviour in day-to-day business activities.

Building on this approach, a continuous training curriculum on anti-corruption and anti-bribery is implemented for employees in risk-exposed functions. These ongoing trainings are designed to strengthen preventive measures across the organisation.

and anti-bribery procedures and standards. Accordingly, no related remedial or disciplinary actions were required.

Procedures in place regarding corruption or bribery

Schaltbau Group applies compliance procedures to prevent, detect and address allegations or incidents of corruption and bribery. These include defined approval and documentation requirements for benefits, donations, sponsoring, memberships and third-party intermediaries, as well as risk-based due diligence for distributors, commercial agents, consultants and other relevant business partners.

The compliance organisation operates at Group and segment level. Designated compliance officers report to management and the Group Compliance Officer. Employees receive documented training on anti-corruption, anti-bribery and related compliance topics. Preventive and event-driven compliance audits, as well as internal audits of selected entities, support the identification of weaknesses and potential misconduct.

For relevant business partners, Schaltbau Group applies structured due diligence and risk-based controls, including background checks, review of remuneration structures, sanctions list screening and enhanced scrutiny in higher-risk countries. In the area of anti-money laundering, procedures include the prohibition of cash transactions, identification of beneficial owners and politically exposed persons, sanctions list screening and targeted reviews of payment flows.

Potential violations can be reported through the Schaltbau Group's whistleblowing system. Incoming reports are acknowledged, assessed and, where necessary, investigated by the compliance function or internal audit in line with defined investigation procedures. Confirmed violations may result in corrective measures, including disciplinary action, remediation of control weaknesses, process adjustments and, where required, notifications to authorities.

During the reporting period, Schaltbau Group has not identified any breaches of its anti-corruption

Corporate culture and protection of whistle-blowers related actions

To strengthen whistleblower protection and encourage open reporting, Schaltbau Group operates a whistleblowing hotline and promotes its use in compliance training. Employees are informed about available reporting channels, the option to raise concerns confidentially and the principles for handling reports in a fair, timely and appropriate manner. Schaltbau Group plans to further embed whistleblowing awareness and non-retaliation principles into its compliance communications and training activities.

Cyber Security related actions

During the reporting period, the Schaltbau Group further developed its decentralised cybersecurity framework in response to an elevated risk profile. Enhancements were implemented in the areas of network security, monitoring and protection mechanisms to address identified vulnerabilities. These measures were complemented by the introduction of global backup concepts at selected entities, aimed at strengthening data protection and improving recovery capabilities.

In addition, cyber awareness trainings were conducted at Group level, and IT policies and governance frameworks were reviewed and adjusted and aligned with the revised IT setup.

Planned actions include expanding network monitoring across entities, implementing structured backup solutions at additional locations and enhancing incident response capabilities. These measures will focus on closing security gaps, increasing resilience, particularly at international sites, and improving business continuity preparedness. Supplier and IT supply-chain security measures are also planned to be further operationalised.

Supplier Relationship Management and payment practices related actions

The management of Schaltbau Group's relationships with suppliers is structured to comply with regulatory requirements, such as the German Supply Chain Due

Diligence Act, and to mitigate supplier-related risks to the business. A central element is the Code of Conduct for business partners, which sets minimum requirements for human rights, working conditions, environmental protection and ethical business conduct and is integrated into supplier relationships.

For new suppliers with a planned annual purchasing volume above a defined threshold and strategically long-term cooperation, acknowledgement of the Code of Conduct for business partners or an equivalent code, as well as the inclusion of standard contractual clauses under the German Supply Chain Due Diligence Act, is established as a prerequisite before business commencement. Existing suppliers identified as higher risk based on country, sector and volume criteria are requested to sign the Code of Conduct for business partners, agree to the relevant contractual clauses and, where necessary, complete a supplier self-assessment covering human rights and environmental due diligence.

Direct and indirect suppliers are assessed using a risk-based methodology. Identified risks may lead to preventive or remedial measures such as contractual clauses, training requirements, on-site controls or, in serious cases, suspension or termination of the business relationship following a defined escalation process. Incidents and remedial measures are documented and fed back into risk management.

Payment practices are aligned with contractual provisions and legal requirements. Adherence to agreed terms forms part of maintaining fair and reliable supplier relationships and is monitored through standard procurement and finance processes.

Planned actions focus on further strengthening sustainability and compliance aspects within supplier management and on enhancing data quality. Schaltbau Group plans to deepen the use of risk-based supplier self-assessments, further standardise the integration of German Supply Chain Due Diligence Act clauses and the Code of Conduct for business partners in contracts across entities, and refine digital documentation and tracking of supplier obligations, risk classifications and audit results.

4.1.2. Metrics related to business conduct

Confirmed incidents of corruption or bribery

In the reporting year, Schaltbau Group did not identify any incidents that resulted in convictions or sanctions for violations of applicable anti-corruption or anti-bribery laws within the corporate group. Consequently, no fines, penalties or other monetary sanctions arose from such topics for Schaltbau Group in the reporting period.

Quantitative disclosures on convictions and sanctions for violations of anti-corruption and anti-bribery laws

Total number of convictions and sanctions	0
Total amount of fines	0

In line with this approach, Schaltbau Group continues to aim to prevent any violations of applicable anti-corruption and anti-bribery laws. All employees are expected to comply consistently with internal requirements as well as with all applicable legal provisions.

Payment practices

Schaltbau Group does not apply a uniform standard payment term measured in a fixed number of days. Payment terms are determined individually for each business relationship, taking into account contractual arrangements, customary international trading practices and any applicable discount conditions. This approach results in a range of different payment periods across the supplier portfolio.

For all supplier relationships, Schaltbau Group adheres to the contractually agreed payment terms and aims to process payments in accordance with these conditions. In the reporting year, there are no outstanding legal proceedings against Schaltbau Group arising from late payments to suppliers.

5. APPENDIX

5.1. Policy overview

An integral part of managing identified impacts, risks and opportunities is the application of policies and guidelines across the Schaltbau Group. The policies referenced in this Sustainability Report are described in the respective topical chapters. The overview below provides additional information on their key contents, objectives, scope, references to external standards or initiatives and related reporting chapters.

Policies may apply at different organisational levels, including Group, segment or entity level, depending on the topic and the respective governance structure.

Policy / guideline	Key contents and objective	Scope	Third-party standards / initiatives	Related chapters
Schaltbau Group Code of Conduct	Defines Group-wide principles for lawful, ethical and responsible conduct. It addresses ethical management, environmental protection, product safety, integrity in business relationships, employee-related principles, business conduct requirements, reporting integrity, whistleblowing and compliance implementation.	Schaltbau Group	OECD Anti-Bribery Convention; UN Convention against Corruption; U.S. Foreign Corrupt Practices Act (FCPA); UK Bribery Act	G1 Business conduct; E1 Climate change; E5 Resource use and circular economy; S1 Own Workforce; S2 Workers in the value chain
Group Compliance Guideline	Describes the compliance organisation, roles and responsibilities, and core processes for preventing and addressing legal violations, including corruption, antitrust and money-laundering infringements.	Schaltbau Group	-	G1 Business conduct
Money Laundering Prevention Policy	Sets out risk-based customer and transaction due diligence, cash restrictions, sanctions screening, enhanced checks for higher-risk jurisdictions and politically exposed persons, documentation and reporting duties, as well as the appointment of Anti-Money Laundering Compliance Officers in the relevant entities.	Schaltbau Group	EU Anti-Money Laundering Directives (including the 5th EU AML Directive); National anti-money-laundering and counter-terrorist-financing laws; EU Delegated Regulation 2016/1675 (and amendments) and the German National Risk Assessment; Transparency International's Corruption Perceptions Index (CPI)	G1 Business conduct
Guideline on Donations, Sponsoring and Memberships	Governs how monetary and in-kind contributions to external organisations and events are initiated, approved and documented, with the objective of preventing misuse for improper influence.	Schaltbau Group	-	G1 Business conduct
Guideline on Invitations and Gifts	Regulates the offering and acceptance of business courtesies. It defines thresholds and approval processes and prohibits benefits that could improperly influence business decisions or create such an appearance.	Schaltbau Group	-	G1 Business conduct
Guideline for Distributors and Commercial Agents	Sets uniform standards for the selection, engagement and monitoring of distributors and commercial agents, including due diligence requirements, contractual compliance clauses and transparency obligations regarding remuneration and services provided.	Schaltbau Group	-	G1 Business conduct
Guideline for Consultants	Governs the engagement of external consultants and advisors, including criteria for legitimate consulting services, documentation of scope, necessity and remuneration, and transparent payment channels.	Schaltbau Group	-	G1 Business conduct
Rules of Procedure for Complaints	Defines the whistleblowing and complaints framework for reporting and handling legal violations, breaches of internal rules, and human rights and environmental risks in the Group's own operations and supply chain. It includes confidential handling, protection of whistleblowers and accessible reporting channels.	Schaltbau Group	German Supply Chain Due Diligence Act; German Whistleblower Protection Act; OECD Anti-Bribery Convention; UN Convention Against Corruption; relevant ILO conventions; Minamata, Stockholm and Basel Conventions	S1 Own workforce; S2 Workers in the value chain, G1 Business conduct;

Policy / guideline	Key contents and objective	Scope	Third-party standards / initiatives	Related chapters
Corporate Guideline on Information Security	Defines binding rules for the use and protection of information and IT systems. It aims to safeguard confidentiality, integrity and availability of information, raise security awareness and ensure legally compliant handling of sensitive and personal data.	Schaltbau Germany	-	G1 Business conduct
Bode Declaration on Information Security	Sets out overarching definitions and includes a formal commitment to the information security management system. It defines objectives, principles and responsibilities to ensure the confidentiality, integrity, availability and authenticity of information and IT systems.	Bode Germany	-	G1 Business conduct
Bode Policy on Information Security	Specifies rules for the handling and classification of information, physical and logical access control, passwords and authentication mechanisms, mobile work and removable media, backup and recovery, logging and monitoring, and secure disposal of data and equipment.	Bode Germany	-	G1 Business conduct
Bode Corporate Guideline Cybersecurity Requirements	Defines cybersecurity requirements for products and systems, including security-by-design and security-by-default requirements over the product life cycle.	Bode Germany	DIN IEC 62443-4-2	G1 Business conduct
Bode Information Security Guideline for Suppliers and Contractors	Defines binding requirements for external suppliers, service providers, consultants and contractors that access information, systems or resources of Bode, including their subcontractors.	Suppliers	ISO/IEC 27001; EU General Data Protection Regulation (GDPR)	G1 Business conduct
Pintsch Information Security Declaration and Information Security Policies	Set out overarching definitions and a formal commitment to the information security management system and define technical and organisational requirements for systems and networks, including secure configuration, information protection and handling of information security incidents.	Pintsch	ISO 27001; EU General Data Protection Regulation (GDPR)	G1 Business conduct
Code of Conduct for business partners	Defines minimum requirements for business partners and suppliers. It addresses legal compliance, human rights, labour standards, occupational health and safety, equality, diversity and inclusion, complaints mechanisms, environmental protection, material requirements, conflict minerals, waste, hazardous substances and responsible use of raw materials and natural resources.	Suppliers	Ten principles of the United Nations Global Compact; core labour standards of the International Labour Organization; UK Modern Slavery Act 2015; German Supply Chain Due Diligence Act; OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas	E5 Resource use and circular economy; S2 Workers in the value chain; G1 Business conduct
Schaltbau Integrated Management System Documentation	Describes the integrated management system of Schaltbau, including quality, information security and environmental management. It defines the management system scope, documentation hierarchy, responsibilities and relevant environmental management principles.	Schaltbau	ISO 9001; ISO/TS 22163; IATF 16949; ISO/IEC 27001; ISO 14001; StVR	E1 Climate change; E5 Resource use and circular economy
Schaltbau Environmental Management Guideline	Defines the procedure for identifying, assessing and managing environmental aspects and for preventing environmental damage, taking legal requirements and the environmental policy defined by management into account.	Schaltbau	-	E1 Climate change; E5 Resource use and circular economy
Pintsch Corporate Policy	Sets out corporate principles for Pintsch, including quality, safety, availability, environmental protection, occupational safety, health and information security.	Pintsch	-	E1 Climate change; E5 Resource use and circular economy; S1 Own workforce
Pintsch SHE Management Documentation	Defines responsibilities and procedures for safety, health and environmental management, including environmental aspects, legal obligations, planning of measures, audits, emergency preparedness and management review.	Pintsch	ISO 14001; ISO 45001	E1 Climate change; E5 Resource use and circular economy; S1 Own workforce

Policy / guideline	Key contents and objective	Scope	Third-party standards / initiatives	Related chapters
Bode Environmental Policy	Defines Bode's environmental policy and environmental management approach, including continuous improvement, reduction of environmental impacts, monitoring of significant environmental aspects and objectives, and responsible use of resources.	Bode Germany & UK Environmental Policy		E1 Climate change; E5 Resource use and circular economy
ISO 14001 certificates	Confirm ISO 14001 certification for selected environmental management systems and sites. The certificates provide third-party certification evidence for the environmental management systems used to address environmental aspects such as climate, energy, resource use and waste.	Schaltbau: Germany, France, India, UKPintsch: GermanyBode: Germany	ISO 14001	E1 Climate change; E5 Resource use and circular economy
Declaration of principles (German Supply Chain Due Diligence Act)	Sets out binding expectations on human rights and labour standards, environmental protection, health and safety, and business ethics in the supply chain, including implementation requirements, monitoring mechanisms and consequences in case of non-compliance.	Schaltbau Group	German Supply Chain Due Diligence Act; Sustainable Development Goals; EU Conflict Minerals Regulation	S1 Own workforce; S2 Workers in the value chain
Policy for Implementation of the German Supply Chain Due Diligence Act	Defines human rights and environmental due diligence for the global supply chain, including systematic risk analysis, preventive and remedial measures, complaints and reporting procedures, designation of Human Rights Officers, and continuous improvement in line with the German Supply Chain Due Diligence Act.	Schaltbau Group	United Nations Global Compact; International Labour Organisation (ILO); UK Modern Slavery Act 2015; Organisation for Economic Cooperation and Development (OECD) Due Diligence Guiding Principles; EU Conflict Minerals Regulation	S2 Workers in the value chain
Entity-specific employee handbooks and policies	Schaltbau UK: Employee Handbook Schaltbau UK: Health & Safety Policy Schaltbau France: Reglement Interieur Schaltbau US: Employee Handbook Bode US: Employee Handbook Bode UK: Health & Safety Policy Bode UK: Equality and Diversity Policy Bode UK: Employee Handbook Bode Germany: Health & Safety Policy	Entity-specific		S1 Own workforce
Corporate Guideline on Waste and Hazardous Substances Management	Defines Schaltbau's waste and hazardous substances management processes, including responsibilities, legal compliance, waste classification, segregation, disposal, and documentation requirements across all sites.	Schaltbau	German Circular Economy Act (KrWG), German Ordinance on Waste Recovery and Disposal Records (NachwV), German Water Resources Act (WHG), Ordinance on Installations Handling Substances Hazardous to Water (VAwS), German Hazardous Substances Ordinance (GefStoffV), Technical Rules for Hazardous Substances (TRGS)	E5 Resource use and circular economy

SCHALTBAU

HOLDING

LEGAL NOTICE

Publisher: Schaltbau Holding AG · Hollerithstraße 5 · 81829 Munich, Germany · E-mail: info@schaltbau.de ·
www.schaltbaugroup.com

Authorised representatives of the Management Board: Steffen Munz

