



SUSTAINABILITY REPORT 2024

ORYX STAINLESS GROUP .



Together, we build for tomorrow.



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GRI 1: FOUNDATION 2021

The Oryx Stainless Group has prepared this Sustainability Report in accordance with the Global Reporting Initiative (GRI) Standards for the reporting period from 01.01.2024 to 31.12.2024. This report has not been externally audited. Nevertheless, we have taken great care to ensure the accuracy, completeness, and clarity of the information presented, reflecting our ambition to embed sustainability deeply into our operations and stakeholder dialogue.

GRI 2: GENERAL DISCLOSURES 2021

2-1 ORGANIZATIONAL DETAILS (ESRS 2)

The Oryx Stainless Group (the Group), with its parent company **Oryx Stainless Holding B.V.**, is an internationally leading business group specialized in the trading and processing of stainless-steel scrap as a high-quality raw material for stainless steel production. Our customers include producers of long and flat stainless steels across global markets, while on the supplier side we rely on a broad and continuously expanding international procurement network.

Oryx Stainless Holding B.V., headquartered at 's-Gravendeelsedijk 159, 3316 AS Dordrecht, the Netherlands, is privately owned and holds 100% ownership of all its subsidiaries.

The Group has entities in six countries across two continents. The legal entities of the Oryx Stainless Holding B.V. are the following (including addresses):

- **Oryx Stainless B.V.**
's-Gravendeelsedijk 175, NL-3316 AS Dordrecht, the Netherlands
- **Oryx Stainless AG**
Rheinstraße 97, D-45478 Mülheim an der Ruhr, Germany
- **Oryx Stainless (Thailand) Co., Ltd.**
92/8-9 Moo 1, Tambol Homsin, Amphur Bangpakong, Chachoengsao, Thailand 24130
- **Oryx Stainless España S.L.U.**
Muelle Comercial sn, 08800 Vilanova i la Geltrú, Barcelona, Spain
- **Oryx Stainless Malaysia Sdn. Bhd.**
PTD4692, Jalan Rumbia 4, Kawasan Perindustrian Tanjung Langsat, 81700 Pasir Gudang, Johor, Malaysia
- **Oryx Stainless Polska Sp. z o.o.**
Aleja Grunwaldzka 472B, 80-309 Gdańsk, Poland



2-2 ENTITIES INCLUDED IN THE ORGANIZATION'S SUSTAINABILITY REPORTING (ESRS 2 BP-1)

This sustainability report covers the entities of the Oryx Stainless Group that were actively engaged in business operations during the reporting period. Accordingly, Oryx Stainless B.V., Oryx Stainless AG, Oryx Stainless (Thailand) Co., Ltd., and Oryx Stainless España S.L.U. are fully included in the scope of this reporting.

The Group's two additional legal entities – Oryx Stainless Malaysia Sdn. Bhd. and Oryx Stainless Polska Sp. z o.o. – have not yet commenced business operations. As a result, they are excluded from the organization's sustainability reporting for this period. However, Oryx Stainless Malaysia Sdn. Bhd. is scheduled to begin operations in February 2025 and will therefore be integrated into the 2025 sustainability report, once sustainability-relevant activities and impacts can be consistently assessed.

2-3 REPORTING PERIOD, FREQUENCY AND CONTACT POINT (ESRS 1)

The reporting period of this Sustainability Report covers the full calendar year from 1 January 2024 to 31 December 2024. The Oryx Stainless Group reports on its sustainability performance annually. This report was released in November 2025. The next report, covering the 2025 reporting year, is expected to be published around Q3/Q4 of 2026.

Any questions regarding the Sustainability Report of the Oryx Stainless Group can be directed to the following contact point, who is responsible for the preparation of this report:

ESG Manager of the Oryx Stainless Group
Dr. Laurenz Preusse
Rheinstrasse 97
45478 Mülheim an der Ruhr
Germany

Tel: +49 163 6809 255

Mail: preusse@oryx.com

2-4 RESTATEMENTS OF INFORMATION (ESRS 2 BP-2)

For this reporting period, no restatements of information from the 2023 Sustainability Report are required, as the underlying data and disclosures published in our first Group-wide report remain valid and unchanged. However, in the course of developing the 2024 Sustainability Report, the Oryx Stainless Group has strengthened its overall reporting approach.



While last year's report was prepared with reference to the GRI Standards, we have now chosen to report in accordance with the GRI Standards, thereby aligning our practices more closely with internationally recognized sustainability reporting expectations. This transition does not alter previously reported information but reflects our commitment to increased transparency.

2-5 EXTERNAL ASSURANCE

To ensure the quality and reliability of this Sustainability Report, the Oryx Stainless Group maintains a robust set of internal control mechanisms. Throughout the reporting process, regular coordination takes place between the ESG Manager responsible for Group-wide sustainability reporting and the dedicated managers in each of the included entities. Before publication, all reported information and data are, as in the 2023 Sustainability Report, reviewed and approved by the managing directors of the respective entities as well as by the Chief Executive Officer (CEO) of the Group.

Complementing these internal controls, the Group periodically seeks external expertise to strengthen the quality of its systems, processes, and methodologies. The materiality assessment, which forms the foundation of our ESG Strategy, was originally developed in close collaboration with external consulting firms and the Group's leadership team, including the CEO. It continues to serve as a central guiding document for our ESG efforts.

In addition, the materiality assessment is continuously reviewed and updated to ensure that it remains aligned with evolving expectations, regulatory developments, and stakeholder priorities. Through ongoing dialogue with key external stakeholders – particularly banks, customers, and other business partners – we regularly revisit and refine the ESG-related material topics most relevant to the Oryx Stainless Group. This continuous improvement approach ensures that our ESG Strategy remains robust, current, and responsive to both internal and external developments.

The 2024 Sustainability Report of the Oryx Stainless Group has not been audited by an independent assurance provider. A post-publication review may be considered to further enhance the credibility and continuous improvement of our reporting practices. Any (pre-)selection of potential assurance providers will be carried out collaboratively by the personnel involved in preparing and reviewing this report, including the managing directors of the various entities and Group leadership.

In addition to these internal and potential external assurance mechanisms, the Group's sustainability performance is assessed through recognized external rating platforms. Oryx Stainless has participated in the EcoVadis sustainability assessment since 2022, when we received our first Silver medal with a score of 57 points, marking the beginning of our external evaluation journey.



In our previous Sustainability Report, we announced our ambition to achieve the EcoVadis Gold medal by 2025. Following an improved Silver rating in 2023 with a score of 63 points, we continued to enhance our sustainability practices and governance.

We are therefore particularly proud that, in 2025, Oryx Stainless successfully achieved the EcoVadis Gold medal, scoring 77 points and placing the Group in the top 5% of all companies assessed globally. This accomplishment represents a significant milestone in our sustainability journey and confirms the effectiveness of our long-term commitment to responsible business conduct, transparency, and continuous improvement.

2-6 ACTIVITIES, VALUE CHAIN AND OTHER BUSINESS RELATIONSHIPS
(ESRS 2 SBM-1)

The Oryx Stainless Group operates in the circular economy sector. In particular, the focus is on processing stainless steel scrap materials to produce raw materials from recycling for the production of new stainless steel products. At operational entities of Oryx Stainless, we are actively engaged in sourcing scrap material, analyzing and storing input material, blending scrap batches according to customer specifications, and delivery of blended scrap material via multi-channel logistics to customers across the globe.

Processing of stainless steel scrap is an integrated parameter of the stainless steel value chain:

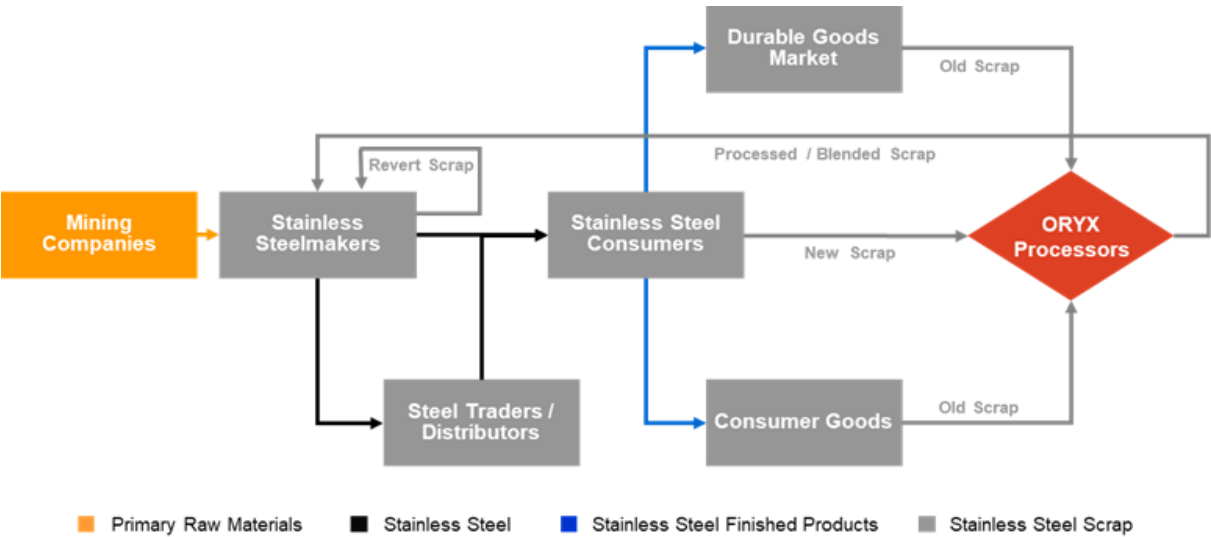


Figure 1 Stainless steel value chain (Source: Oryx illustration)



The following figure gives an overview of the activities carried out at the operational sites of the Oryx Stainless Group:



Figure 2 Processes at Oryx' operations (Source: Oryx illustration)

Customers of the Oryx Stainless Group include producers of long and flat stainless steels across global markets. On the supplier side, the Group maintains a broad and continuously expanding international procurement base. We source stainless steel scrap from verified suppliers around the world, carefully analyze and process its contents, and subsequently blend the material to meet the precise specifications of our customers. The products prepared for our customers predominantly include the following stainless-steel scrap grades (as well as smaller volumes of other relevant alloy compositions):

- 18-8 (Cr/Ni) 304 stainless steel scrap blends
- 18-10-2 (Cr/Ni/Mo) 316 stainless steel scrap blends
- Cr-Steel scrap

The aim of the Group is to provide tailor-made products for its customers in the stainless-steel industry and to serve as a reliable and attractive partner to its core suppliers, thereby fostering long-lasting business relationships that create value for all parties involved.



2-7 EMPLOYEES (ESRS 2 SBM-1)

Across the Group, a total of 224 employees (excluding management) were employed during the reporting period from 1 January to 31 December 2024, excluding the entities in Poland and Malaysia, which were not yet operational. In contrast to the previous reporting year, where average full-time equivalent (FTE) figures were applied, the 2024 figures are based on end-of-year headcount, providing a more accurate representation of the Group's workforce composition at the close of the reporting period.

Table 1 Oryx workforce by location and gender

	2023 (annual average FTE)					2024 (year-end headcount)				
	NLD	GER	THA	ESP	ORYX	NLD	GER	THA	ESP	ORYX
Workforce*	59 (27%)	45 (21%)	102 (47%)	10 (5%)	216 (100%)	69 (31%)	47 (21%)	98 (44%)	10 (4%)	224 (100%)
Male	49 (83%)	38 (84%)	61 (60%)	7 (70%)	155 (72%)	56 (81%)	37 (79%)	58 (59%)	7 (70%)	158 (71%)
Female	10 (17%)	7 (16%)	42 (40%)	3 (30%)	61 (28%)	13 (19%)	10 (21%)	40 (41%)	3 (30%)	66 (29%)

* Percentages for total workforce of respective entity shown as share of Group

Information related to new hires and employee turnover is disclosed in Section GRI 401: Employment 2016, which has been prepared to correspond with the relevant ESRS disclosure requirements.

In order to report in accordance with the GRI Standards, and compared to the Sustainability Report 2023, the Group has expanded the scope and level of detail of workforce-related disclosures. Additional information has been included on the composition of the workforce by full-time and part-time employment, as well as by permanent and temporary contracts, each further differentiated by region and gender, where applicable.

Furthermore, the Group now provides enhanced disclosures on the number of employees by region and age group, as well as on the number of employees with disabilities, broken down by region and gender. These additional disclosures aim to improve transparency, comparability, and alignment with both GRI and ESRS requirements, and to provide stakeholders with a more comprehensive view of the Group's workforce structure.

All newly added information is presented in the next tables.

SUSTAINABILITY REPORT 2024

ORYX STAINLESS GROUP.



Table 2 Oryx workforce by location and age group

	NLD	GER	THA	ESP	GROUP
Total 2024	69	47	98	10	224
under 30 years old	14 (20%)	6 (13%)	20 (20%)	3 (30%)	43 (19%)
30-50 years old	31 (45%)	19 (40%)	68 (69%)	3 (30%)	121 (54%)
over 50 years old	24 (35%)	22 (47%)	10 (10%)	4 (40%)	60 (27%)

* Percentages based on respective entity's total workforce

Table 3 Oryx workforce by permanent and temporary employees by location and gender

Permanent/Temporary	NLD		GER		THA		ESP		GROUP	
	P.	T.	P.	T.	P.	T.	P.	T.	P.	T.
Total 2024*	52 (75%)	17 (25%)	46 (98%)	1 (2%)	98 (100%)	- (0%)	10 (100%)	- (0%)	206 (92%)	18 (8%)
Male	42 (61%)	14 (20%)	37 (79%)	- (0%)	58 (59%)	- (0%)	7 (70%)	- (0%)	144 (64%)	14 (6%)
Female	10 (14%)	3 (4%)	9 (19%)	1 (2%)	40 (41%)	- (0%)	3 (30%)	- (0%)	62 (28%)	4 (2%)

* Percentages based on respective entity's total workforce

Table 4 Oryx workforce by Full-time and Part-time employees by location and gender

Full-time/Part-time	NLD		GER		THA		ESP		GROUP	
	FT	PT	FT	PT	FT	PT	FT	PT	FT	PT
Total 2024*	55 (80%)	14 (20%)	43 (91%)	4 (9%)	98 (100%)	- (0%)	9 (90%)	1 (10%)	205 (92%)	19 (8%)
Male	48 (70%)	8 (12%)	37 (79%)	- (0%)	58 (59%)	- (0%)	7 (70%)	- (0%)	150 (67%)	8 (4%)
Female	7 (10%)	6 (9%)	6 (13%)	4 (9%)	40 (41%)	- (0%)	2 (20%)	1 (10%)	55 (25%)	11 (5%)

* Percentages based on respective entity's total workforce

Table 5 Oryx workforce with disabilities by location and gender



Table 5 Oryx workforce with disabilities by location and gender

Employees with disabilities	NLD	GER	THA	ESP	GROUP
Total 2024*	1 (1%)	4 (9%)	- (0%)	- (0%)	5 (2%)
Male	1 (1%)	2 (4%)	- (0%)	- (0%)	3 (1%)
Female	- (0%)	2 (4%)	- (0%)	- (0%)	2 (1%)

* Percentages based on respective entity's total workforce

The Oryx Stainless Group continues to focus on attracting and retaining qualified personnel across all operational areas, particularly in yard operations and purchasing. At the same time, the Group is committed to fostering an inclusive working environment in which diversity is recognized as a shared value and actively supported by all employees.

To guide this development, the Group has refined its gender diversity objectives. Earlier ambitions to increase the proportion of female employees have evolved into clearer long-term targets: the Group now aims to achieve a 65% male and 35% female overall workforce composition by 2027 and to increase female representation at management level as soon as a suitable candidate is identified.

Each of the entities included in this sustainability report has its respective management. The following table shows the gender distribution in the respective entity. The number of managers below are excluded from the total number of employees in the tables above.

Table 6 Oryx management by location and gender

	2024 (management board)				
	NLD	GER	THA	ESP	GROUP
Total	2 (100%)	3 (100%)	3 (100%)	1 (100%)	9 (100%)
Male	2 (100%)	3 (100%)	3 (100%)	1 (100%)	9 (100%)
Female	- (0%)	- (0%)	- (0%)	- (0%)	- (0%)

With regard to employee turnover, a total of 28 employees left the Group during the reporting period, resulting in an overall turnover rate of 12.5%. This represents a slight increase compared to the previous year. The Group aims to reduce the turnover rate in 2025 or at least maintain it at a stable level, supported by ongoing efforts to strengthen employee retention and development across all entities. Further details on turnover data for the Group and for each entity can be found in the table below.



Table 7 Oryx turnover rate by location

	2023 (FTE-based)					2024 (headcount-based)				
	NLD	GER	THA	ESP	ORYX	NLD	GER	THA	ESP	ORYX
Turnover rate	7.5%	10.6%	12.7%	20.0%	11.2%	17.4%	10.6%	10.2%	10.0%	12.5%
Employee departures	4.4	4.75	13.0	2.0	24.15	12	5	10	9	28

2-8 WORKERS WHO ARE NOT EMPLOYEES

All individuals included in the workforce figures reported in this section are directly employed by the Oryx Stainless Group and are therefore part of our payroll. In addition to our own employees, we engage external service providers for specific tasks such as maintenance work or other specialized services. However, this workforce category is not assessed as part of our KPIs, as these workers fall outside the reporting scope.

2-9 GOVERNANCE STRUCTURE AND COMPOSITION
(ESRS 2 GOV-1, ESRS G1)

GOVERNANCE STRUCTURE AND COMPOSITION

- **CEO:** The Chief Executive Officer (CEO) of Oryx Stainless Group is responsible for overseeing day-to-day operations and executing the company’s business strategy.
- **Meeting of Shareholders:** The major shareholders participate in regular both formal and informal meetings where they discuss strategic issues, including ESG matters, alongside other crucial management aspects. While these discussions are not always formalized, they are integral to decision-making processes.
- The **Group Management** functions as the highest governance body responsible for major strategic oversight and ensuring the company’s long-term sustainability.

2-10 NOMINATION AND SELECTION OF THE HIGHEST GOVERNANCE BODY

Depending on the legal form and geographic location of each entity, some entities also have a supervisory board appointed by their shareholders. While the current share of female employees and managers remains relatively low, the Group aims to address potential female talents and experts in a more targeted manner going forward.



Management periodically assesses the level of diversity within the Group as well as the size and composition of the entities' Management Boards (executive and non-executive). Where relevant, Management provides recommendations regarding the desired profile for Management Board candidates. The criteria are intended to ensure that the Boards reflect a sufficient diversity of perspectives and possess the expertise necessary to understand the industry and the longer-term risks and opportunities relevant to the Group's business. In assessing optimal diversity, the nature and complexity of the Group's activities, as well as the social and environmental context in which it operates, are taken into account.

The selection of candidates for appointment to a Management Board is primarily based on their industry experience. Nevertheless, the Group seeks to fill vacancies by considering candidates who bring diversity in terms of age, gender, regional background, identity, and educational and professional experience.

2-11 CHAIR OF THE HIGHEST GOVERNANCE BODY

Please refer to 2-9 Governance structure and composition.

2-12 Role of the highest governance body in overseeing the management of impacts (ESRS 2 GOV-1/2, SBM-2, ESRS G1)

The highest governance body ensures that management impacts, including financial, environmental, and social aspects, are properly assessed and integrated into business strategies. This includes close attention to sustainability (ESG) topics, which are part of the regular agenda in their meetings, whether formal or informal.

The highest governance body holds regular discussions to ensure that:

- **Key business risks** and opportunities are evaluated.
- **Sustainability-related impacts** are measured, managed, and reported.



2-13 DELEGATION OF RESPONSIBILITY FOR MANAGING IMPACTS
(ESRS 2 GOV-1/2, ESRS G1-3)

At Oryx, sustainability topics are fully embedded in the Group’s overall governance structure and hold the same importance as any other business consideration. They are integrated into daily operations, decision-making processes, and management routines in line with the Group’s responsible business approach. The governance structure for managing sustainability impacts has not changed compared to the previous reporting year and continues to ensure clear responsibilities, transparency, and efficient data flows across all entities.

This structure will also apply to the newly opening facility in Malaysia, scheduled to commence operations in February 2025. As in all other entities, the local finance teams will report directly to the central Sustainability Team, which consolidates sustainability-related data at Group level, monitors consistency and compliance, and responds to cross-entity sustainability inquiries. This centralized governance model ensures a coherent sustainability management approach across the entire Group and supports robust, comparable reporting and impact assessment.

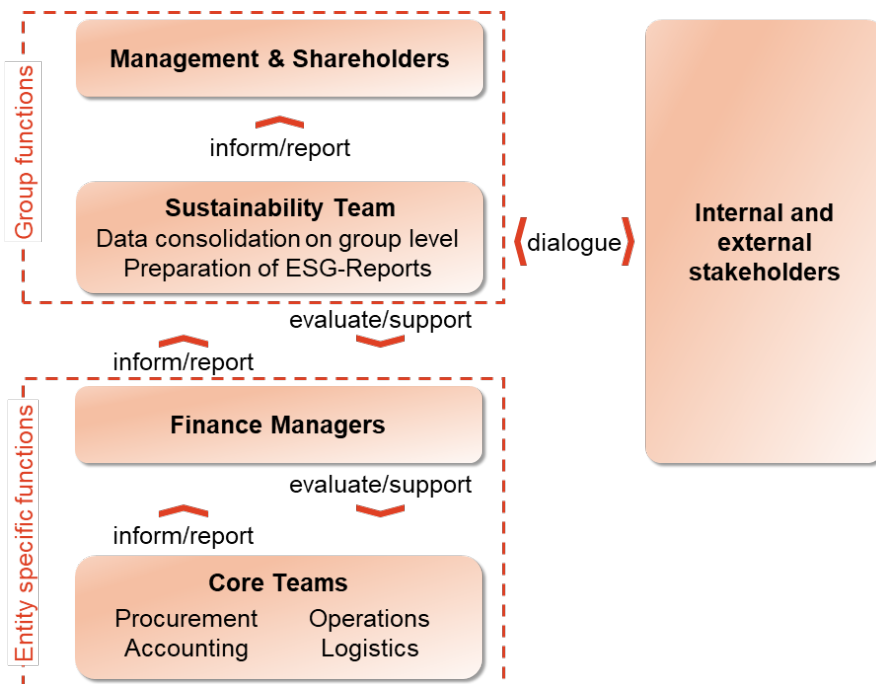


Figure 3 Sustainability within Oryx' governance structure



2-14 ROLE OF THE HIGHEST GOVERNANCE BODY IN SUSTAINABILITY REPORTING (ESRS 2 IRO-1, GOV-5)

The highest governance body oversees the sustainability reporting process and is responsible for reviewing and approving the Group's sustainability disclosures to ensure alignment with applicable regulations and recognized industry best practices. It ensures that ESG-related communication is transparent and that the Group's sustainability initiatives are implemented consistently across all entities and accurately reflected in formal reporting.

Furthermore, the highest governance body is accountable for ensuring that the sustainability reporting provides a true and fair representation of the Group's performance and its progress toward ESG-related objectives.

2-15 CONFLICTS OF INTEREST

To prevent and mitigate potential conflicts of interest, the Oryx Stainless Group has established an Employee Code of Conduct and maintains a web-based whistleblower system through which employees can anonymously report any suspected violations. The whistleblowing platform is operated in cooperation with an external law firm, ensuring confidentiality and independence. Access is provided through the Oryx Stainless website and is available in the relevant local languages for all employees across the Group.

As outlined in last year's Sustainability Report, the Group planned a full roll-out of the Employee Code of Conduct across all operational entities in 2024. This roll-out was successfully completed during the reporting year. Every employee received a copy of the Code of Conduct in the appropriate language and participated in an induction session explaining its content and expectations. Receipt, review, and understanding were formally documented through signed employee acknowledgments. The Group's entity in Malaysia will likewise be included in the Code of Conduct rollout and training program once operations commence in February 2025.

During the reporting period from 01.01.2024 to 31.12.2024, there were no complaints or reports submitted through the whistleblower system and no recorded incidents of misconduct or violations of the Code of Conduct in any entity of the Group.

2-16 Communication of critical concerns (ESRS 2 GOV-2, ESRS G1-1/3)

The Oryx Stainless Group requires all employees and members of management to always act in full compliance with applicable laws and regulations. The Group expects all personnel to conduct themselves with fairness, integrity, and respect – toward colleagues as well as toward customers, suppliers, business partners, and competitors.



All employees are encouraged to take an active role in preventing, identifying, and addressing potential violations of legal or ethical standards. To support this, the Group operates a web-based whistleblower system through which employees can anonymously report concerns or suspected misconduct. The platform is managed in cooperation with an external law firm, ensuring independent handling and immediate transfer of all submitted reports to Oryx Stainless' designated internal reporting officers. This enables prompt and comprehensive investigation of any concerns and, where necessary, the implementation of appropriate corrective actions. The whistleblowing system has been operational since November 2023.

2-17 COLLECTIVE KNOWLEDGE OF THE HIGHEST GOVERNANCE BODY (ESRS 2 GOV-2)

The Group's management has established a committee dedicated to addressing sustainability concerns. This committee functions across the entire group and consists of a multi-member sustainability team. The CEO of the Oryx Stainless Group is part of this sustainability team. Through weekly update calls, the management is therefore immediately informed about the latest developments regarding progress on sustainable development goals.

Additionally, studies on the company's sustainable business practices are regularly conducted in collaboration with independent research institutes. These studies are distributed internally within the Group and are also used for direct exchanges with external stakeholders, such as financial institutions as well as the various associations Oryx is represented in (please refer to 2-28 Membership associations).

For further information please refer to figure in 2-13 Delegation of responsibility for managing impacts.

2-18 EVALUATION OF THE PERFORMANCE OF THE HIGHEST GOVERNANCE BODY

The evaluation of the performance of the highest governance body is not publicly disclosed due to confidentiality considerations. Internal assessment processes are in place to ensure effective leadership and oversight. However, the specific methods and outcomes remain internal to the organization.



2-19 REMUNERATION POLICIES (ESRS 2 GOV-3, ESRS E1)

Providing fair working conditions and appropriate social protection for all employees is a key priority for the Oryx Stainless Group, regardless of location or employment type. Remuneration is designed to be fair, balanced, and consistent, reflecting gender equality principles while taking into account employees' skills, recognized talents, and prevailing practices in the respective local labor markets.

The remuneration policy for members of the highest governance body is not disclosed due to confidentiality. For additional information related to remuneration, please refer to the consolidated financial statements.

2-20 PROCESS TO DETERMINE REMUNERATION (ESRS 2 GOV-3)

As outlined in the 2023 Sustainability Report, the Group follows a clear and structured approach to determining remuneration. This process has been consistently applied throughout 2024. It begins with a detailed analysis of each position to define responsibilities and assess the role's value within the organization. This is complemented by market benchmarking to ensure that compensation levels remain competitive and aligned with industry standards. Based on these inputs, the Group applies a remuneration approach that balances internal fairness with external competitiveness and may include performance-based components where appropriate.

Remuneration is reviewed periodically to reflect market developments, company objectives, legal requirements, and potential inflationary effects. By following this structured process across all entities, the Group ensures a fair, transparent, and competitive compensation framework.

For additional information related to remuneration, please refer to the consolidated financial statements.

2-21 ANNUAL TOTAL COMPENSATION RATIO (ESRS S1-16)

The annual total compensation ratio is not disclosed for this reporting period. Due to the Group's organizational structure, which spans multiple countries with differing labor markets, regulatory environments, and compensation systems, this indicator cannot yet be calculated in a consistent and meaningful manner across all entities.



While the Group ensures fair and competitive remuneration within each location, the underlying data structures are not currently aligned for a consolidated assessment of this metric. The Group will continue to review the relevance and potential future reporting of this indicator.

2-22 STATEMENT ON SUSTAINABILITY DEVELOPMENT STRATEGY (ESRS 2 SBM-1)

While the global stainless steel market is projected to continuously rise by significant percentages in the upcoming decades, the world's reserves of primary raw materials remain limited. Therefore, their responsible and efficient use is becoming increasingly important. By converting stainless steel scrap into a ready to use raw material for high quality stainless steel production, the Oryx Stainless Group takes on a crucial role in fostering the transformation towards a sustainable, circular economy.

As a partner of the stainless steel industry, the Oryx Stainless Group has evolved into one of the leading international processing and trading organizations focusing on raw materials to produce high-quality stainless steel. Specializing in handling and processing stainless steel scrap, the Group harmonizes economic value creation and corporate responsibility and benefits of a circular economy.

Oryx' mission is to maintain and further develop the transition toward a circular economy in stainless steel and related materials and thereby safeguard environmental, social, and economic prosperity in the short, mid and long term.

Leveraging the life cycle of stainless steel is at the heart of the Group's business strategy and implies not only economic value creation but also the preservation of our planet and people. Based on the responsibility of a family-owned business, we continuously search for opportunities to maximize this overlap in economic, social, and environmental prosperity. We are aware that this process does not always follow a win-win paradigm. Instead, sustainable transformation is marked by paradoxes and tensions between social, environmental, and economic objectives which require thorough evaluation in our decision-making to guarantee long-term viability.

The "Sustainability Compass", serving as key Sustainability Strategy document, is inspired by our mission and tailored to reflect the core capabilities and unique positioning of the Group in the stainless steel value chain. It unites the Group's most material ESG issues in a framework and thereby cuts a very clear path towards our contribution to the industry's sustainable development. However, the Sustainability Compass not only serves to guide the Groups' actions and helps channel its resources. It also looks beyond operations by informing all stakeholders about the approach to sustainability and thereby encourages us to openly discuss ESG issues and take collective action along the value chain.



2-23 POLICY COMMITMENTS

(ESRS 2 GOV-4, MDR-P, ESRS S1-1/2-1/3-1/4-1, G1-1)

The Oryx Stainless Group is committed to upholding the highest standards of ethics and sustainability across all areas of its business. The Employee Code of Conduct (CoC) serves as a central framework guiding our workforce toward integrity, transparency, and accountability in all professional actions. The Code ensures compliance with applicable laws and regulations, safeguards employee rights, and promotes a workplace free from discrimination. Through regular training sessions, we continuously reinforce the importance of ethical behavior and emphasize our zero-tolerance approach to bribery, corruption, and money laundering.

On an external level, the Group's Supplier Code of Conduct extends our ethical values throughout our supply chain. Suppliers are required to comply with stringent social and environmental standards, including respect for human rights and the prohibition of forced labor. By signing the Supplier Code of Conduct, suppliers also confirm that they are not subject to economic or financial sanctions and do not conduct business with sanctioned countries, regions, or counterparties. We continuously and carefully monitor market and regulatory developments and update the Supplier Code of Conduct when necessary to reflect evolving expectations and requirements.

Another integral element of our sustainable procurement practices is our regularly reviewed Know-Your-Customer (KYC) process, which in the context of the Oryx Stainless Group is primarily applied as a Vendor Due Diligence process and therefore covers all suppliers prior to entering into a business relationship. This process helps us maintain ethical business practices and identify potential risks within our supply chain. At least once per year, the KYC (Vendor Due Diligence) process is reevaluated to ensure it remains aligned with market developments, regulatory updates, and emerging risk factors. Compared to the previous reporting year, the KYC risk assessment matrix was updated in March 2024 and the acceptance criteria were further strengthened. As a result of this update, the Group has raised its risk thresholds and now considers certain risk combinations to be no longer manageable. In particular, Oryx Stainless no longer enters into business relationships with suppliers classified as Category 2 suppliers that are located in potentially critical countries, as identified in the medium-risk category of the lower section of the matrix. Table 8 KYC Risk Assessment Matrix below presents the risk assessment matrix used to determine whether a potential supplier may be accepted. Risk is evaluated based on an activity risk (business type) and a country risk (supplier location), following guidance provided by the European Union.

For further information on the KYC (Vendor Due Diligence) process, please refer to GRI 308-1 New suppliers that were screened using environmental criteria and GRI 414-1 New suppliers that were screened using social criteria.



Table 8 KYC Risk Assessment Matrix

Regional Customer type			
	Not critical	Potentially critical	Prohibited countries
Category 1 Yard operator Producer Originator	- Scrap companies with own yard(s) / assets - Typically known within the industry and well documented	- Scrap processors with own yard(s) / assets - Additional information required to assess risk	Scrap processors or Traders in countries sanctioned by the US or the EU
Category 2 Trader	- Usually larger organizations or well established companies - Typically known within the industry and well	Traders in countries with weak anti-money laundry regulations	
Category 3 Sales entities	Trading outlets of producers or yard operators	Trading outlets and potentially critical countries	

■ Low risk
■ Manageable risk
■ Risk not manageable / no business

On the customer side, the Oryx Stainless Group predominantly works with internationally operating stainless steel producers, many of which are listed companies and therefore subject to stringent ESG reporting and compliance requirements. This close cooperation supports a high level of transparency and facilitates alignment on sustainability-related expectations along the value chain.

In addition to governance-related policy commitments such as the Employee Code of Conduct, Supplier Code of Conduct, and the KYC process (applied as Vendor Due Diligence for suppliers), the Group maintains a range of environmental and social programs that reflect our broader commitment to responsibility and sustainability. At each operational entity, comprehensive environmental programs are in place to minimize our environmental footprint and promote sustainable practices. Likewise, robust health and safety programs are implemented across the Group to uphold the highest standards of occupational safety and employee well-being.



As planned, the Group has now developed overarching environmental as well as health and safety policies at the Group level. These policies provide a unified framework for all entities and will be reviewed on an annual basis to ensure they remain aligned with market developments, regulatory expectations, and – as it relates to health and safety – the operational realities and evolving risks across all Oryx Stainless Group facilities.

By embedding these commitments into our policy framework, both internally and externally, we continue to foster a responsible business environment that supports social justice, environmental stewardship, and long-term value creation.

2-24 EMBEDDING POLICY COMMITMENTS **(ESRS 2 GOV-2, MDR-P, ESRS S1-4/2-4/3-4/4-4, G1-1)**

The Oryx Stainless Group ensures that its policy commitments are firmly embedded across all business operations through continuous education, structured processes, and active oversight. The dedicated sustainability team (see 2-13) plays a central role in this effort by regularly providing comprehensive training on business ethics to employees at all levels. These sessions reinforce expectations regarding ethical conduct, environmental responsibility, adherence to the Employee and Supplier Code of Conduct, and the Group's broader sustainability commitments. Cybersecurity awareness and responsible handling of digital information have also become integral components of these trainings, reflecting the importance of data protection in our operational environment.

In addition, the Group holds regular finance meetings with finance managers from all entities. These meetings are essential for reviewing and refining the KYC processes (applied as Vendor Due Diligence for suppliers) to reflect current market developments, regulatory changes, and emerging risks. This collaborative approach ensures that the Group's commitments to anti-corruption, money-laundering prevention, and ethical supplier engagement remain effective and up to date.

By embedding these commitments into daily operations, the Oryx Stainless Group fosters a culture of compliance, responsibility, and sustainability that supports the organization's long-term goals.

2-25 PROCESSES TO REMEDIATE NEGATIVE IMPACTS **(ESRS S1-1/2-1/3-1/4-1)**

The Oryx Stainless Group is committed to identifying, addressing, and remediating any negative impacts it may cause or contribute to, as well as any grievances in which it may be involved, in line with its core values of corporate responsibility and sustainability.



A key element of this approach continues to be the Group's KYC process (applied as Vendor Due Diligence for suppliers). Through regular global finance meetings, potential risks and negative impacts identified by individual entities are shared, discussed, and reviewed collectively at Group level. This cross-entity exchange enhances transparency, supports early risk identification, and enables consistent mitigation measures across the organization.

In addition, the Group operates a web-based whistleblower system, which has been established and active since November 2023. Supported by an external law firm, the system allows employees as well as external stakeholders to submit reports anonymously, which are then reviewed by designated internal reporting officers to ensure objective investigation and appropriate action. No reports of violations, grievances, or negative impacts were submitted through the whistleblower system in either 2023 or 2024.

Beyond formal reporting mechanisms, the Oryx Stainless Group actively promotes a speak-up culture across all entities. Employees are encouraged to openly raise concerns, express dissatisfaction, or discuss potential negative impacts directly with management or relevant functions without fear of retaliation. This open dialogue complements formal processes and supports early identification and resolution of issues before they escalate.

2-26 MECHANISMS FOR SEEKING ADVICE AND RAISING CONCERNS (ESRS S1-3/2-3/3-3/4-3, G1-1)

While the sustainability function of the Oryx Stainless Group operates as a Group-wide responsibility supported by a multi-member sustainability team, each entity remains responsible for implementing policies at the local level. The sustainability team continues to play a central advisory role, supporting entities throughout implementation processes and ensuring consistent application across the Group.

As outlined in the 2023 Sustainability Report, the sustainability team planned to conduct regular trainings on responsible business conduct, including the roll-out of the Employee Code of Conduct. This plan was successfully implemented in 2024, and all employees across all operational entities received the planned training on responsible business conduct, ensuring a common understanding of expectations and standards throughout the Group.

Regarding mechanism to raise concerns about the Group's business conduct, all our employees are encouraged to participate and take action against potential violations against laws and regulations to achieve the desired business conduct, concerning all environmental, social, and governance-related topics. For this purpose, we provide a whistleblowing system that is described above in detail.



2-27 COMPLIANCE WITH LAWS AND REGULATIONS (ESRS 2 SMB-3, ESRS E2-4, S1-17, G1-4)

In the reporting period of this sustainability report from 01.01.2024 to 31.12.2024 there were no incidents of non-compliance with laws and regulations reported in the entire Oryx Stainless Group.

2-28 MEMBERSHIP ASSOCIATIONS (ESRS 2 MDR)

The Oryx Stainless Group is a member of several international associations. By means of our engagement in various international associations we are in regular exchange with our stakeholders as well as other companies from the industry. This helps us to identify trends early on, share knowledge and to jointly pave the way for a more sustainable future.

The Oryx Stainless Group is member of the following associations:

- Bundesvereinigung Deutscher Stahlrecycling- und Entsorgungsunternehmen e.V. (BDSV)
- Verband Deutscher Metallhändler und Recycler e. V. (VDM)
- Bureau of International Recycling (aisbl) (BIR)
- Metaal Recycling Federatie (MRF)
- Institute of Scrap Recycling Industries, Inc. (ISRI) – rebranded to Recycled Materials Association (REMA) in April 2024
- German-Thai Chamber of Commerce
- Netherlands-Thai Chamber of Commerce
- Federación Española de la Recuperación y el Reciclaje (FER)

Oryx' directors take a leading role in some of the abovementioned associations. These are the BDSV, in which an Oryx director functions as Chairman of the Technical Committee and the BIR. Moreover, another Oryx director functions as Chairman of the Stainless Steel and Special Alloys Committee.

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In addition to memberships in the abovementioned associations, the Group regularly engages with internationally leading applied research organizations such as Fraunhofer Institute for Environmental, Safety and Energy Technology UMSICHT. This allows us to share knowledge of the benefits of stainless steel scrap as a raw material for the production of long and flat stainless steels and to transmit this knowledge to the broader society.



2-29 APPROACH TO STAKEHOLDER ENGAGEMENT (ESRS 2 SMB-2, ESRS S1-1/2-1/3-1/4-1)

The Oryx Stainless Group's approach to stakeholder engagement is based on open, transparent, and continuous dialogue with parties that are directly affected by or connected to our business activities. The objective of this engagement is to understand stakeholder perspectives, identify emerging risks and opportunities, and ensure that business decisions reflect relevant environmental, social, and governance considerations. Through regular communication, the Group seeks to align its strategy with stakeholder expectations and to strengthen responsible business practices and sustainability performance.

The Group's key stakeholders include employees, institutional stakeholders such as financial institutions, suppliers of stainless steel scrap, customers such as stainless steel mills, and local communities. Engagement with these stakeholder groups takes place through a variety of formal and informal channels, tailored to the nature of each relationship.

With regard to financial institutions, the Group maintains regular exchanges with several international banking partners. These discussions include updates on the Group's ESG activities, sustainability initiatives, and relevant risk assessments, and form an integral part of ongoing financing and compliance-related interactions.

Engagement with suppliers occurs on a continuous basis, particularly through the Group's purchasing teams. All suppliers are required to undergo the Group's KYC process (applied as Vendor Due Diligence for suppliers)^a, which is regularly reviewed and adapted to reflect market developments and regulatory requirements. In addition, suppliers must acknowledge and comply with the Supplier Code of Conduct, reinforcing shared expectations on ethical, social, and environmental standards.

The Group engages frequently with its customers, particularly stainless steel mills, with interactions taking place at least on a weekly basis. In addition to operational coordination, the Group has established regular update calls with key partners to exchange information on mutual developments in the area of sustainability and sustainability-related activities. Customer surveys and other communication formats are also used to share updates on the sustainability performance of the Group's operational entities.

Finally, finance managers engage regularly with secondary stakeholders and intermediaries, such as banks and LME brokers, to meet external KYC requirements and to provide information on key sustainability-related metrics and developments.



2-30 COLLECTIVE BARGAINING AGREEMENTS
(ESRS S1-8)

Most employees of the Oryx Stainless Group are not covered by collective bargaining agreements (CBAs). In the 2024 reporting period, 4.5% of the Group’s workforce, based on end-of-year headcount, was covered by a CBA. This represents a slight decrease compared to 2023, when coverage was calculated using annual average FTE figures, and reflects changes in the composition of the workforce across individual entities. A detailed overview of employee numbers and the proportion of employees covered by CBAs is provided in the table below.

Table 9 Collective bargaining agreements by entity

	2023 (FTE-based)					2024 (headcount-based)				
	NLD	GER	THA	ESP	ORYX	NLD	GER	THA	ESP	ORYX
Total workforce	59	45	102	10	216	69	47	98	10	224
Covered by CBAs	1 (1.7%)	- (0%)	- (0%)	9 (90%)	10 (4.6%)	- (0%)	- (0%)	- (0%)	10 (100%)	10 (4.5%)

In 2023, employees covered by CBAs were reported in both the Netherlands and Spain. In 2024, coverage applies exclusively to Oryx Stainless España S.L.U. in Vilanova, where the entire workforce is subject to a collective bargaining agreement. No employees at Oryx Stainless B.V. in the Netherlands are covered by a CBA in 2024, marking a change from the previous reporting year.

Across the Group, employees generally have the right to join trade unions in accordance with applicable local laws. However, aside from the arrangements described above, employment terms and working conditions are determined at the entity level and are not influenced by collective bargaining agreements.

GRI 3: MATERIAL TOPICS 2021

3-1 PROCESS TO DETERMINE MATERIAL TOPICS
(ESRS 2 BP-1, IRO-1)

Within the scope of the Group’s ESG strategy, the Oryx Stainless Group has conducted a comprehensive materiality assessment aimed at identifying its most relevant sustainability topics and capturing the Group’s potential positive and negative contributions to sustainable development. The assessment follows a dual-lens approach, considering both the relevance of ESG topics to stakeholders and the Group’s outward business impacts on these topics.



As a foundation for the assessment, an extensive industry and value-chain analysis of the stainless-steel sector was carried out in collaboration with external advisors. This analysis served to identify relevant ESG topics and was complemented by a review of sustainability approaches adopted by competitors, suppliers, and customers. In addition, the United Nations Sustainable Development Goals (SDGs) were used as a reference framework to ensure alignment with globally recognized sustainability priorities.

Following the identification of relevant ESG topics, an internal workshop and three structured interviews with members of the Group's highest management were conducted to assess and rank the topics according to their perceived importance. Publicly available materiality assessments from customers and competitors were also reviewed and incorporated into the analysis. The final prioritization of ESG topics reflects a combination of stakeholder relevance and the relative impact of the Oryx Stainless Group on these issues.

Limitations and updates compared to 2023: As noted in the 2023 Sustainability Report, the materiality assessment represents a snapshot in time and is subject to change as internal and external conditions evolve. While the initial assessment involved a limited number of stakeholder groups, additional stakeholder dialogue was conducted during the 2024 reporting period, including more in-depth discussions with financial institutions and sustainability representatives of key customers. These exchanges helped to further validate the relevance of the identified material topics. Looking ahead, the Group intends to deepen these stakeholder engagements and to consider potential adjustments to material topics where warranted by changing market conditions or stakeholder expectations.

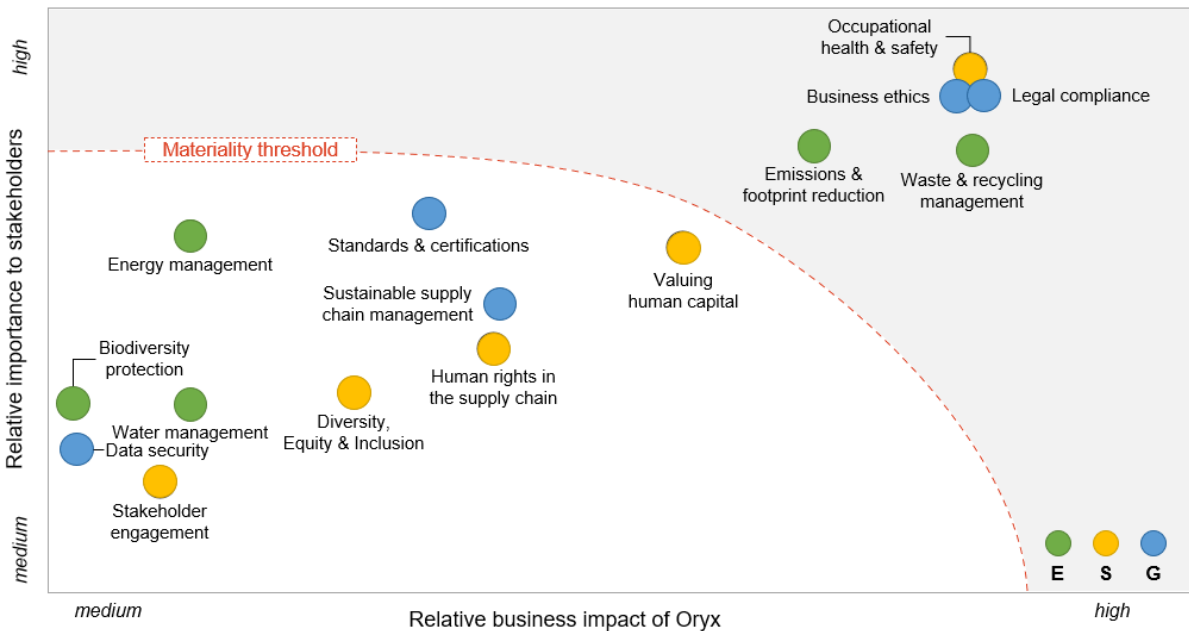
Compared to the 2023 reporting year, no significant changes to the Group's material topics were identified, and the same sustainability topics and reporting standards continue to apply. Further details on the confirmed material topics are provided in the following section 3-2 List of material topics.

3-2 LIST OF MATERIAL TOPICS
(ESRS 2 SBM-3)

The determination process of our material topics resulted in the following matrix which is unchanged from the matrix provided in our Sustainability Report 2023:



Figure 4 Materiality analysis of the Oryx Stainless Group



With its business model, the Oryx Stainless Group is well positioned to leverage the recycling of stainless steel scrap in a way that significantly reduces the industry’s environmental footprint, protects the health and safety of its employees, and sets an example as a trusted partner through responsible business conduct.

Prioritization is essential to focus the Group’s sustainability efforts. Taking a strategic approach to sustainability requires identifying and prioritizing those ESG topics that offer the greatest potential for Oryx to contribute to sustainable development. Based on the Group’s business strategy and the materiality assessment, three sustainability topics were identified as most relevant to both stakeholders and operations. While these topics form the core focus of the Group’s efforts, other ESG areas continue to be addressed. At the same time, this prioritization ensures that resources and management attention are allocated effectively to maximize joint social, environmental, and economic value creation.

These priorities are structured and communicated through the Oryx Stainless Sustainability Compass, which serves as the central framework for the Group’s sustainability strategy. The Compass is built around three core pillars, each comprising two focus areas of action, and translates the results of the materiality assessment into a clear and actionable strategic structure. Developed by the Group’s leadership and closely interwoven with the overarching business strategy, the Sustainability Compass supports the systematic integration of material ESG topics across operations, business processes, departments, and individual responsibilities.



In developing the Sustainability Compass, Oryx Stainless aligned its sustainability strategy with internationally recognized frameworks for responsible business conduct, including the UN SDG Compass, which was jointly developed by the UN Global Compact, the Global Reporting Initiative, and the World Business Council for Sustainable Development (WBCSD). This alignment ensures that the Group’s material topics and strategic priorities are consistent with globally established principles for sustainable development and transparency, while remaining tailored to Oryx Stainless’ specific role within the stainless steel value chain.

The three core pillars and their respective focus areas are illustrated in the figure below.



Figure 5 Core pillars of the Oryx Stainless Group's ESG strategy

The following describes our approaches and goals for each of the three core pillars:

Circularity (E) – We blend scrap lots to transform them into a ready-to-use high-quality raw materials blend from recycling. By closing the loop, we maximize resource efficiency while reducing the industry’s environmental impact. Hence, our business is a key component of designing a system in which waste is designed out entirely, with the goal of net positivity.

Employee well-being (S) – The well-being of Oryx’s employees is a primary concern in all our operations. Nurturing a personal relationship with our employees through open communication and personal support is key for maintaining a respectful working environment, our core capabilities and hence, business prosperity.

Business Integrity (G) – It is our top priority to be a trusted partner. Complying with legal and ethical standards as well as our stakeholders and own standards and policies, therefore, is key. But our responsibility does not stop at the boundaries of our business. We intend to carry our responsible business behavior into our value chain.

Overall, as a responsible business the Oryx Stainless Group is committed to the United Nations Sustainable Development Goals. This framework represents a major opportunity for us to shape, steer, communicate and report our ESG strategy, targets, and activities among our stakeholders.



While we understand the importance of each of the 17 Sustainable Development Goals and their close interconnections, a thorough analysis of the framework revealed that especially the following four Goals are aligned with our strategic ESG pillars and hence provide a potential for Oryx to create a true, positive impact (see Figure 6 below).

Figure 6 Key UN Sustainable Development Goals for Oryx (Source: United Nations)



The theory of change shown below aims to articulate the long-term sustainability impact we seek to achieve and the pathways through which we intend to realize this change. The model supports a clear understanding of the relationship between the Group’s activities and their contribution to sustainable development and enhances the effectiveness of engagement and communication around our ESG strategy. Compared to the 2023 Sustainability Report, the underlying theory of change remains unchanged.



Figure 7 Theory of change with selected KPIs to measure performance and progress

Oryx' planned work		Oryx' intended results	
ESG pillar	Drivers of change Our areas for potential interventions	Immediate output Selected indicators to measure performance and progress	Core outcome Our contribution to sustainable development
 Circularity	Implementation and compliance with an environmental management system	- Volume of recycled materials - Efficiency ratios regarding energy, electricity, water and waste consumption - GHG emission intensity (Scope 1, 2, 3) - Engagement in collaborative initiatives to promote circularity	 Climate protection Minimize the environmental footprint of our operations and value chain
	Process innovation		 Resource conservation Achieve the sustainable management and efficient use of natural resources within our operations and maximize recycled steel volume returned to the material cycle
	Collective action along the value chain to optimize circularity		
 Employee wellbeing	Implementation and compliance with an occupational health & safety management system	- ISO 45001 certification - Number of health checks per employee - Hours of training on health and safety per employee - Lost Time Injury Frequency Rate	 Employee health and safety Safeguarding a healthy and safe working environment for all our workers
	Fair & equitable compensation	- Employee turnover - Percentage of employees receiving regular performance and career development reviews - Number of workshop regarding Charta of Diversity	 Valuing human capital Have an inclusive work environment which maximizes productivity and personal satisfaction & growth of all our employees
	Training & development opportunities		
 Business integrity	Open communication with employees		
	Corporate transparency (focus on sustainability performance and progress)	- Total number of incidents of non-compliance with regulations and voluntary standards - Hours of business ethics training per employee	 Compliance Our business makes true progress towards sustainability through transparency and compliance with our stakeholders' standards and policies
	Implementation and compliance with a management system addressing violence, corruption, bribery		
	Supply chain transparency (focus on risk assessment issues along the entire value chain)	- Number of ESG factors included into the KYC supplier assessment - Average number of suppliers verified through KYC - Number of collaborative sustainability projects	 Sustainable supply chain Our product is only sustainable if the entire value chain operations are sustainable. Hence, we promote responsible business practices along the entire value chain.
	Close stakeholder relationships for collective action		



The following presents an overview of the sustainability topics covered in this report. The topics are grouped into the three categories Environment, Social, and Governance. In line with the 2023 Sustainability Report, the same material topics are reported in 2024, ensuring continuity and comparability over time. Comparative figures from the 2023 reporting year are included in the tables to support year-on-year analysis.

Please note that the topics listed represent the respective material areas in accordance with the GRI Standards. Detailed information on the specific subtopics addressed under each material topic can be found in the GRI Index (see page 53 and following).

Environment / Circularity:

- GRI 301 Materials 2016
- GRI 302 Energy 2016
- GRI 303 Water and Effluents 2018
- GRI 305 Emissions 2016
- GRI 306 Waste 2020

Social / Employee Wellbeing:

- GRI 401 Employment 2016
- GRI 403 Occupational Health and Safety 2018
- GRI 404 Training and Education 2016

Governance / Business integrity

- GRI 308 Supplier Environmental Assessment 2016
- GRI 414 Supplier Social Assessment 2016

3-3 MANAGEMENT OF MATERIAL TOPICS (ESRS 2 SBM-1/3, MDR, ESRS 1 S1-2/2-2/3-2/4-2)

The following subchapters outline the approach applied by the Oryx Stainless Group to assess both actual and potential economic, environmental, and social impacts, including impacts on human rights. They also address the related opportunities and risks associated with the material topics across the three categories of Environment, Social, and Governance.



3-3-1 MANAGEMENT OF MATERIAL ENVIRONMENTAL TOPICS (ESRS 2 IRO-1)

Oryx Stainless operates within the circular economy, and its core business activities are generally not harmful to the environment. Our operations generate almost no waste or wastewater and instead provide valuable recycled raw materials for further industrial use. As identified through the materiality assessment under the environmental pillar, the Group continues to focus on emissions and footprint reduction, as well as waste and recycling management. These focus areas are embedded in a broader environmental approach covering materials management, energy use, water management, greenhouse gas emissions, and waste handling. This approach is consistent with the priorities described in the 2023 Sustainability Report.

The Group's activities are designed to minimize environmental impacts while promoting resource efficiency. By emphasizing recycling management, Oryx Stainless reduces reliance on primary raw materials, directly contributing to the conservation of natural resources and a reduction in overall greenhouse gas emissions. This approach also supports stakeholder trust and reinforces the Group's positioning as a responsible and sustainable business partner.

Although environmentally related physical and financial risks are considered as part of the Group's business strategy, Oryx Stainless' operations are not considered to be significantly exposed to risks such as extreme weather events, natural disasters, or broader climate-related impacts. In addition to continuous monitoring, external site assessments have been conducted for the Group's entities, confirming that none of the entities are exposed to material climate-related risks and that all sites are adequately protected against such risks. While these assessments are not part of this Sustainability Report, they can be made available upon request. The Group also maintains appropriate insurance coverage, including natural hazard insurance.

The Group's circular business model not only mitigates environmental risks but also creates opportunities for innovation, cost efficiencies, and competitive advantage. In line with SDG 12 (Responsible Consumption and Production), this model supports sustainable production practices and positions Oryx Stainless as a leader in resource efficiency. The classification as a "Green Company pure play" by an international banking partner reflects this positioning, with close to 100% of the Group's revenue derived from sustainable activities.

Oryx Stainless holds multiple certifications that support and strengthen its environmental management approach. ISO 14001 certification currently covers approximately 75% of the Group's operational entities, calculated based on the total volume of recycled material. The remaining entities are progressing toward certification.



The Group's entity in Malaysia, which is scheduled to commence operations in February 2025, is planned to obtain both ISO 14001 and ISO 9001 certification during its first year of operation. ISO 9001 certification is already in place across all other entities, with the exception of Spain, where certification is planned. The German operations hold the "Entsorgungsfachbetrieb" (certified waste management company) designation in accordance with §56 of the Circular Economy Act. End-of-Waste certification is maintained across all entities except Thailand, where the corresponding AQSIQ certification is in place.

Regular energy audits in accordance with DIN EN 16247-1, comparable to ISO 50001 standards, are conducted to ensure energy efficiency and compliance. In addition, membership in industry federations such as the Metaal Recycling Federatie (MRF), which requires strict audit procedures, further demonstrates the Group's commitment to meeting and exceeding industry standards. These certifications and audits play a key role in managing environmental risks while supporting sustainable growth and long-term competitiveness.

In addition, the Group continues to invest in operational improvements that support environmental protection at the site level. In 2025, Oryx Stainless plans the construction of a new hall at its German location in Mülheim, which is intended to reduce internal transport distances between different operational plots at the site. By consolidating activities, the project will help lower emissions associated with internal logistics and improve overall operational efficiency. Furthermore, the new facility is designed to enable enhanced dust and noise control measures, contributing to improved environmental performance and reduced impacts on the surrounding area.

Building on the environmental programs already implemented across its operational entities – reflected in its ISO 14001 certifications – the Group applies a Group-wide environmental policy approach that supports consistent environmental management practices across all entities. This policy approach provides guidance for environmental performance and is reviewed regularly to ensure ongoing alignment with operational developments and evolving requirements.

3-3-2 MANAGEMENT OF MATERIAL SOCIAL TOPICS (ESRS 2 IRO-1)

The Group's commitment to social sustainability is reflected in its continued focus on occupational health and safety (OHS) as well as training and education. These focus areas are essential for maintaining a resilient, skilled, and motivated workforce. Key social topics include employment practices, OHS, and continuous learning, all of which remain integral components of the Group's operational strategy, consistent with the approach outlined in the 2023 Sustainability Report.



Oryx Stainless operates primarily in countries with well-established regulatory frameworks and high standards related to occupational health and safety. Maintaining robust OHS and training programs has a direct and positive impact on employee well-being and operational efficiency. The Group's ISO 45001 certification, which currently covers approximately 75% of operational entities (calculated using the total volume of recycled material as the denominator), demonstrates its commitment to internationally recognized safety standards. Certification of the remaining entities is planned for 2025. Regular maintenance and annual inspections of all machinery further support workplace safety. In addition, employees participate in annual first aid refresher courses to ensure preparedness for emergency situations. Together, these measures help prevent accidents, build employee confidence, and foster a safe and supportive working environment.

Without a strong and consistently applied focus on OHS and continuous training, the Group would face increased risks, including workplace accidents, skills gaps, reduced morale, and potential legal and operational challenges. Such risks could negatively affect productivity, employee retention, and the Group's reputation as a responsible employer. Maintaining high safety and training standards is therefore essential to mitigating these risks and supporting stable operations.

By continuously strengthening OHS practices and expanding training opportunities, the Group promotes a proactive culture that prioritizes both safety and professional development. Safety standards are applied consistently across all sites, supported by clear guidelines and regular training. Annual safety trainings and comprehensive first aid refreshers empower employees and enhance readiness for unforeseen events. Beyond OHS, regular training programs covering topics such as business ethics, environmental awareness, cybersecurity, and occupational safety help address skills gaps and prepare employees for future challenges. In addition, through its involvement in industry associations, the Group supports training initiatives and seminars related to the stainless steel sector, contributing to workforce development and talent attraction.

As outlined above, the Group has already implemented detailed health and safety programs across its operational entities, as reflected in its ISO 45001 certifications. Building on this foundation, a Group-wide health and safety policy further harmonizes practices across all entities. The policy provides a consistent framework to support continuous improvement and reinforces the Group's long-term commitment to maintaining a safe and healthy working environment.



3-3-3 MANAGEMENT OF MATERIAL GOVERNANCE TOPICS (ESRS 2 IRO-1)

The Group places significant emphasis on business ethics and legal compliance as core elements of its governance framework. This commitment is reflected in areas such as supplier environmental, social, and governance assessments, which aim to ensure that business partners adhere to high ethical and sustainability standards. Central to the Group's governance approach is the Employee Code of Conduct (CoC), which defines clear principles for ethical behavior, legal compliance, and corporate integrity. Complementing this, the Supplier Code of Conduct sets environmental, social, and governance expectations for suppliers, promoting transparency and accountability throughout the supply chain. The Group's KYC process (applied as Vendor Due Diligence for suppliers) further reinforces these efforts by ensuring thorough screening of suppliers. Together, these measures support the identification and mitigation of potential negative impacts and help safeguard the Group's integrity and alignment with ESG standards, consistent with the approach described in the 2023 Sustainability Report.

Strong business ethics and compliance mechanisms foster trust among employees, stakeholders, and business partners. The Employee and Supplier Codes of Conduct serve as key instruments for maintaining high standards and promoting a transparent and accountable working environment. In addition, the Group's active involvement in industry associations and its advocacy for stainless steel scrap as a sustainable raw material contribute to broader positive impacts. While the steel industry is traditionally associated with high emissions, Oryx Stainless enables its customers – primarily stainless steel mills – to significantly reduce their carbon footprint by supplying recycled raw materials, thereby supporting decarbonization efforts across the value chain and strengthening the Group's reputation as a responsible industry partner.

Without consistent implementation of ethical standards across all entities, the Group could face risks such as inconsistent business practices, compliance breaches, legal challenges, and potential loss of stakeholder trust. Similarly, insufficient supplier oversight or gaps in the KYC process could expose the Group to ethical or legal risks within the supply chain. Clear communication and regular reinforcement of ethical principles therefore remain essential to maintaining operational integrity and cohesion.

As announced in the 2023 Sustainability Report, the group-wide rollout of the Employee Code of Conduct was completed as planned in 2024 across all operational entities. Each employee participated in dedicated training sessions, received a copy of the Employee Code of Conduct in the appropriate language, and confirmed both the training and receipt of the document through a signed acknowledgment.



This structured rollout has strengthened a shared understanding of ethical expectations and reinforced compliance throughout the Group. Looking ahead, the rollout of the Employee Code of Conduct is planned for the Malaysian entity in 2025, following the commencement of operations. In parallel, the Supplier Code of Conduct and KYC process (applied as Vendor Due Diligence for suppliers) continue to ensure supplier alignment with the Group’s sustainability objectives, while ongoing engagement with local communities supports positive social impact.

ENVIRONMENT / CIRCULARITY

GRI 301 MATERIALS 2016
(ESRS E5)

301-1 MATERIALS USED BY WEIGHT OR VOLUME
(ESRS E5-4)

In the stainless steel industry, the use of recycled scrap material is a key driver of more sustainable production processes. Scrap-based production substantially reduces the environmental footprint by decreasing energy demand, conserving natural resources, and lowering greenhouse gas emissions compared to the use of primary raw materials. Within Europe, stainless steel producers achieve scrap utilization rates of approximately 85%, underscoring the industry’s strong commitment to circularity and sustainable material use.



Figure 8 Global scrap utilization rates (Source: worldstainless)



The Oryx Stainless Group is a key contributor to this achievement, consistently supporting the high rate of scrap utilization in stainless steel production. Our production blends are predominantly composed of stainless steel scrap helping to conserve valuable natural resources and reduce the ecological impact of stainless steel manufacturing. As circularity is already at the core of the business model and material sourcing of the Oryx Stainless Group, we align our operations with global efforts to promote resource efficiency and advance circular economy principles.

The following table shows the total amount of recovered material in the reporting period. Given the highly concentrated nature of the industry in which we operate, with only a limited number of market participants, the Oryx Stainless Group exercises particular caution when disclosing detailed information at country or entity level. To protect commercially sensitive information, certain data is therefore reported at Group level rather than at individual entity level. In some cases, values are presented as aggregated figures or reasonable approximations. This approach ensures transparency while safeguarding confidentiality and competitive integrity.

Table 10 Recycled material delivered by Oryx

	Group		Unit
	2023	2024	
Total amount of recycled material delivered	Approx. 500,000	Approx. 500,000	mt

301-2 RECYCLED INPUT MATERIALS USED
(ESRS E5-4/5)

GRI 302 ENERGY 2016
(ESRS E1)

302-1 ENERGY CONSUMPTION WITHIN THE ORGANIZATION
(ESRS E1-5)

Reducing overall energy consumption remains a critical global priority in addressing climate change. In line with international efforts to limit global warming to 1.5°C, the Oryx Stainless Group continues to focus on improving energy efficiency and reducing its carbon footprint. Achieving long-term sustainability requires ongoing action, and the Group is committed to implementing measures that support meaningful reductions in energy use across its operations.

Respective initiatives illustrate this commitment. Parts of the Group’s vehicle and equipment fleet have been electrified, including the increased use of electric forklifts, reducing dependence on fossil fuels.

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At the German entity, Oryx Stainless sources 100% renewable electricity, resulting in zero CO₂ emissions from purchased power. Looking ahead, the planned construction of a new hall at the Group's German site in Mülheim in 2026 is expected to reduce internal transport distances between operational plots, thereby lowering energy demand and emissions from internal logistics while improving overall operational efficiency. The new facility is also designed to enable enhanced dust and noise control measures, contributing to improved environmental performance. Furthermore, the entity in Germany conducts regular energy audits in accordance with DIN EN 16247-1, comparable to ISO 50001 standards, to systematically identify additional energy efficiency and savings potential.

In addition, for the new operation in Malaysia, the Group plans to install photovoltaic systems on the facility's rooftop, supporting on-site renewable energy generation from the start of operations. Together, these initiatives reflect the Group's continuous efforts to optimize energy consumption, reduce emissions, and contribute to broader climate and sustainability objectives.

The following table presents the total fuel, gas, and electricity consumption across the Group's four operational entities. Compared to the previous reporting year, energy consumption increased, primarily due to construction activities carried out at one of the operational sites during the reporting period, which temporarily led to higher energy demand.

Table 11 Fuel, gas, and electricity consumption of the Oryx Stainless Group

CONSUMPTION	GROUP		UNIT
	2023	2024	
Fuel Consumption	32,716	36,816	GJ
Diesel (Company Cars + Transportation and Materials Handling)	31,038	34,799	
Petrol (Company Cars + Transportation and Materials Handling)	1,678	2,017	
Gases Consumption	706	1,040	
Natural Gas	380	312	
Propane	327	728	
Electricity Consumption	3,344	4,172	
Renewable	585	606	GJ
Non-Renewable	2,814	3,566	
Total	36,822	42,028	



302-3 ENERGY INTENSITY (ESRS E1-5)

The table below illustrates the energy intensity of the Oryx Stainless Group. Energy intensity is calculated using the volume of recovered material as the denominator and reflects energy consumption within the organization only. For confidentiality reasons, the exact quantity of recovered material remains undisclosed in this Sustainability Report, as was also the case in the 2023 Sustainability Report. As a result, the reported energy intensity figures are presented as approximations.

Table 12 Energy intensity per mt of recovered material

	GROUP		UNIT
	2023	2024	
Total amount of recovered material	≈500,000	≈500,000	mt
Total energy consumed (Scope 1+2)	36,822	42,028	GJ
Energy intensity	≈0.074	≈0.084	GJ/mt recovered material

GRI 303 WATER AND EFFLUENTS 2018 (ESRS E3)

303-5 WATER CONSUMPTION (ESRS E3-4)

Responsible water management remains an integral part of the oryx stainless group’s sustainability approach. Although water use was not identified as a material topic in the double materiality assessment, consistent with the 2023 sustainability report, the group acknowledges water as a critical natural resource and continues to pursue measures to limit water consumption across its operations. These efforts support the Group’s broader sustainability objectives and contribute to the long-term preservation of water resources.

The table below presents the water consumption of the Oryx Stainless Group’s operational entities, measured in cubic meters (m³). Compared to the previous reporting year, water consumption in 2024 was slightly higher, primarily due to construction activities carried out at one of the operational sites during the reporting period, which temporarily increased water demand.

Table 13 Water consumption of Oryx by location

Water consumption	NLD	GER	THA	ESP	GROUP
2023	843 m³	779 m³	2,531 m³	75 m³*	4,228 m³
2024	910 m³	710 m³	4,409 m³	143 m³	6,172 m³



GRI 305 EMISSIONS 2016 (ESRS E1)

In line with its commitment to transparency and sustainability, the Oryx Stainless Group reports its Scope 1 and Scope 2 greenhouse gas emissions, covering both direct emissions from owned or controlled sources and indirect emissions from purchased energy. As in the 2023 Sustainability Report, the Group is currently not required to report Scope 3 emissions. The calculation of Scope 1 and Scope 2 emissions is based on the methodology provided by the ecocockpit platform, a tool commissioned by the Effizienz-Agentur NRW on behalf of the Ministry for Environment, Nature Conservation, and Transport of North Rhine-Westphalia, Germany.

The ecocockpit platform follows the Greenhouse Gas Protocol framework, ensuring a standardized and robust calculation approach. A cradle-to-gate perspective is applied, capturing relevant upstream activities as well as direct and indirect greenhouse gas emissions. The primary databases used for these calculations are ProBas and GEMIS.

The Group aims to capture 100% of relevant emissions within its reporting scope. To address potential data gaps or uncertainties, a 10% safety margin is applied, consistent with the approach used in the previous reporting period, to ensure comprehensive and reliable emissions reporting.

305-1 DIRECT (SCOPE 1) GHG EMISSIONS (ESRS E1-4)

Scope 1 emissions refer to direct greenhouse gas (GHG) emissions from sources that are owned or controlled by the organization. Scope 1 emissions are categorized into four subcategories: Scope 1A Business travel using company-owned/controlled vehicles, Scope 1B Transportation/Materials handling using company-owned/controlled vehicles, Scope 1C Use of energy sources in internal combustion processes, and Scope 1D Technical gases. This categorization allows for detailed tracking and management of our direct emissions.

Scope 2 emissions are indirect greenhouse gas (GHG) emissions resulting from the purchase of electricity, steam, heat, or cooling. While these emissions physically occur at the facility where the energy is generated, they are included in the organization's GHG inventory as they are directly linked to the energy consumption of the organization. Tracking and managing Scope 2 emissions is crucial for reducing an organization's overall environmental impact.



The following table shows the Scope 1 and Scope 2 emissions of the operational entities of the Oryx Stainless Group as well as the GHG Emission intensity (GRI 305-4). Due to confidentiality, the exact amount of recovered material will not be disclosed in this sustainability report. Hence, the data for GHG Emission Intensity is approximate:

Table 14 GHG Emissions intensity per mt of recovered material

GHG Emissions	GROUP		UNIT
	2023	2024	
Scope 1 Emissions	3,086.37	3,631.88	t CO ₂ e
Scope 2 Emissions	357.02	473.93	
Total Scope 1 + 2	3,443.39	4,105.81	t CO₂e
GHG Emission Intensity	0.00689	0.00821	t CO₂e/t of recovered material

The figure below shows a more detailed breakdown of GHG emissions by scope and scope subcategory:

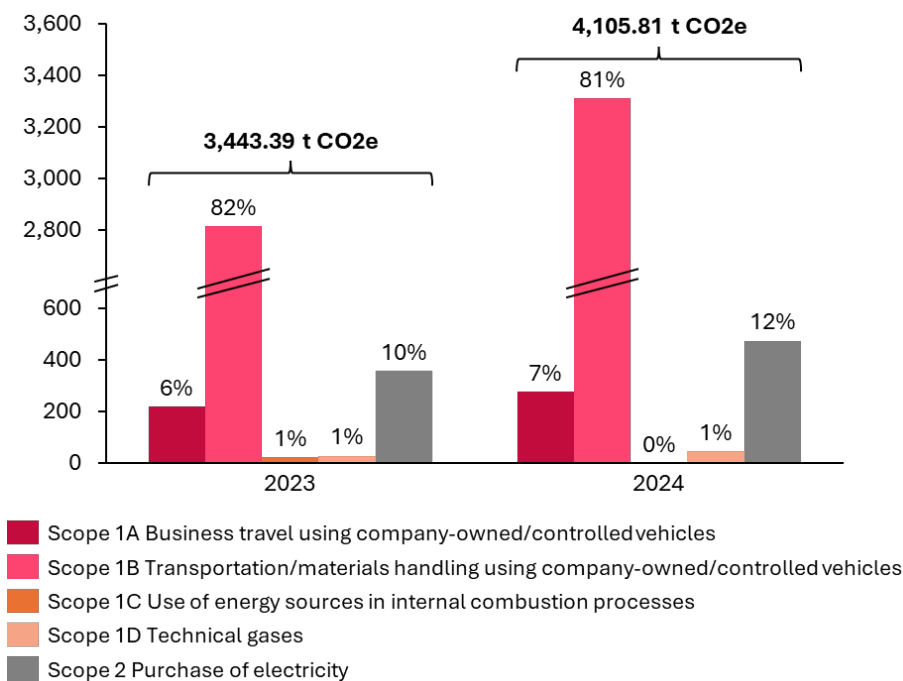


Figure 9 Scope 1 and 2 GHG Emissions by subcategory 2023 and 2024 (Source: Oryx illustration)



305-2 ENERGY INDIRECT (SCOPE 2) GHG EMISSIONS (ESRS E1-4)

Please refer to GRI 305-1 Direct (Scope 1) GHG emissions

305-3 OTHER INDIRECT (SCOPE 3) GHG EMISSIONS (ESRS E1-4)

For the reporting period from 01.01.2024 to 31.12.2024, the Oryx Stainless Group is not required to report Scope 3 greenhouse gas emissions, consistent with the approach applied in the 2023 Sustainability Report. Nevertheless, the Group continues to reference its previously conducted analysis to illustrate the broader climate impact of its business model. In 2022, Oryx Stainless conducted a study in collaboration with the Fraunhofer UMSICHT Institute to assess Scope 3 GHG emissions for the year 2021.

The primary objective of this study was to quantify the greenhouse gas savings achieved through the supply of stainless steel scrap blends that substitute primary raw materials and ferroalloys, which represent the largest share of the Group's Scope 3 emissions.

The study covered operations in Germany, the Netherlands, and Thailand and was carried out in accordance with ISO 14040 and ISO 14044 standards for Life Cycle Assessment (LCA). Data collection and analysis were based on the GaBi Database Version 2022.2.

The results showed that, on a weighted average and including emissions from the Group's own process chain, approximately 7.14 tons of CO₂e per ton of blend shipped were saved through the use of stainless steel scrap instead of primary raw materials. Total net greenhouse gas savings amounted to approximately 3,571,000 t CO₂e, while total gross GHG savings were calculated at 3,810,000 t CO₂e. The Group's process chain – including scrap collection, inbound transport, preparation of finished blends, and transport to steel mills – accounted for approximately 239,000 t CO₂e in GHG emissions. These results underscore the substantial environmental benefits of the Group's recycling-focused business model.

At the time of finalizing the 2024 Sustainability Report, preparations have begun to assess an update of the Scope 3 study. A potential future update would reflect current operational conditions and is expected to include the planned new operation in Malaysia, once sufficient data is available.



305-4 GHG EMISSIONS INTENSITY
(ESRS E1-6)

Please refer to GRI 305-1 Direct (Scope 1) GHG emissions and GRI 305-3 Other indirect (Scope 3) GHG emissions.

The study conducted in collaboration with the Fraunhofer UMSICHT Institute yielded interesting results concerning the GHG emissions intensity per material recovered from Oryx Stainless' operations. It gave insights about the greenhouse warming potential of primary raw materials compared to the use of stainless steel scrap for stainless steel production.

For our product 18-8 (Cr/Ni) 304 stainless steel scrap blends up to 7.0 t-CO₂e per t can be saved if 304 steel is produced with 100% scrap compared to primary materials. For 18-10-2 (Cr/Ni/Mo) 316 stainless steel scrap blends these savings are elevated to up to 8.5 t-CO₂e. Figure 10 shows a comparison of savings potential per product type.

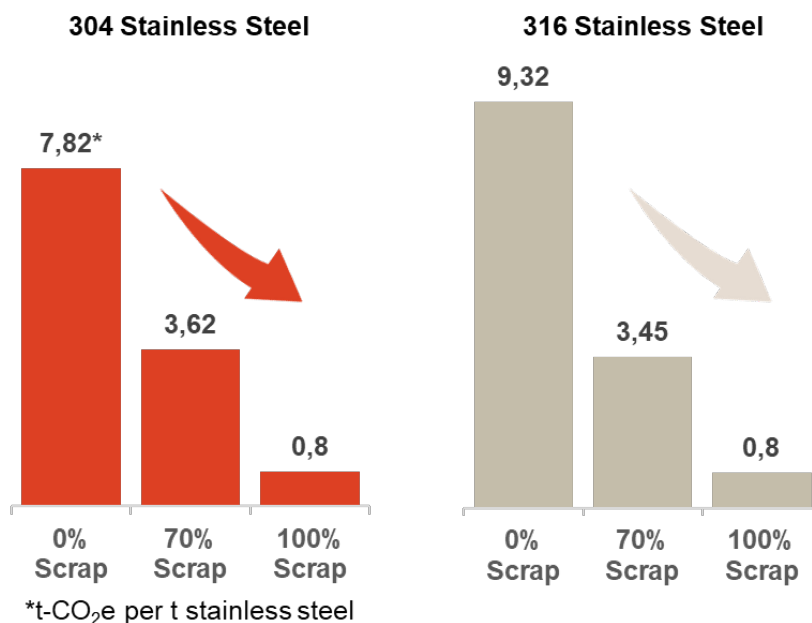


Figure 10 Carbon footprint reduction by using stainless steel scrap (Source: Oryx illustration)



GRI 306 WASTE 2020 (ESRS E5)

306-1 WASTE GENERATION AND SIGNIFICANT WASTE-RELATED IMPACTS (ESRS 2 SBM-3, ESRS E5-4)

The Oryx Stainless Group remains committed to responsible waste management and to minimizing environmental impacts across its operations. As a business operating within the circular economy, the Group generates two primary waste streams: upstream metal waste and downstream general waste. In 2024, upstream metal waste accounted for approximately 99.94% of total waste generated, reflecting a slight increase compared to 99.93% in 2023. This material consists of clean, high-quality recycled metal and is fully returned to the production cycle as raw material for new stainless steel products, demonstrating the Group's strong alignment with circular economy principles.

Downstream general waste represented approximately 0.06% of total waste in 2024, compared to 0.07% in the previous year. This waste stream primarily comprises typical office waste, operational residues, and minimal by-products from blending activities, and is therefore environmentally insignificant in relation to the Group's overall waste profile.

The Group holds End-of-Waste certification in accordance with European Commission Regulation (EU) No. 333/2011, confirming that processed metal scrap is reclassified as a product rather than waste. This certification provides added value for customers choosing certified materials. It is important to note that there is no quality difference between stainless steel scrap delivered under the End-of-Waste scheme and non-certified material supplied to steel mills.

The Group's commitment to quality management and environmental stewardship is further supported by its certifications. Across the four operational entities, approximately 95% are certified under ISO 9001 for quality management, and around 75% hold ISO 14001 certification for environmental management (both calculated using the total volume of recycled material as the denominator). Together, these certifications and waste management practices underscore the Oryx Stainless Group's dedication to sustainable operations, high-quality processes, and resource efficiency.



306-3 WASTE GENERATED
(ESRS E5-5)

As described under GRI 306-1, the Group’s operational sites generate two main waste streams: valuable metal waste/raw materials derived from recycling activities and downstream general waste. The valuable metal waste stream continues to represent the vast majority of total waste, amounting to approximately 500,000 metric tons, all of which is fully recycled and supplied to customers as raw materials for stainless steel production.

Downstream general waste amounted to 313.22 metric tons in 2024, reflecting a reduction from 366.17 metric tons in 2023. This corresponds to an improvement of approximately 14.5% year-on-year. While this waste stream remains comparatively small relative to the metal waste stream, it is systematically monitored and managed in accordance with applicable regulatory requirements.

The table below provides an overview of downstream general waste generated across the Group’s operational sites. Waste types are classified in line with Directive 2008/98/EC of the European Parliament and of the Council (EU Waste Code groups) and are presented in descending order by volume.

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Table 15 Amount of waste handled by Oryx by waste code

WASTE CODE	DESCRIPTION	GROUP		UNIT
		2023	2024	
15 01	packaging (including separately collected municipal packaging waste)	188.74	159.35	mt
17 02	wood, glass and plastic	76.92	78.22	
16 10	aqueous liquid wastes	46.29	-	
17 09	other construction and demolition wastes	27.72	21.88	
13 02	waste engine, gear and lubricating oils	13.50	2.32	
15 02	absorbents, filter materials, wiping cloths and protective clothing	6.43	8.86	
20 01	separately collected fractions	6.28	18.39	
12 01	wastes from shaping and physical and mechanical surface treatment of metals and plastics	0.16	-	
16 02	wastes from electrical and electronic equipment	0.12	-	
16 06	batteries and accumulators	0.01	-	
13 01	waste hydraulic oils	-	6.00	
13 05	oil/water separator contents	-	5.00	
06 13	wastes from inorganic chemical processes not otherwise specified	-	4.86	
19 12	wastes from the mechanical treatment of waste not otherwise specified	-	8.33	
TOTAL		366.17	313.22	mt

306-4 WASTE DIVERTED FROM DISPOSAL (ESRS E5-5)

As mentioned in GRI 306-1 the total amount of approx. 500,000 mt of metal waste is fully recycled into raw materials as input for the production of new high quality stainless steel products at our customers. Hence, the share of metal waste diverted from disposal is 100%.



In addition, during the 2024 reporting period, 18.39 metric tons of downstream general waste were also diverted from disposal. At this stage, detailed information on the specific diversion methods applied to this waste stream is not yet available. Further differentiation of diversion routes is planned to be included in the 2025 Sustainability Report.

306-5 WASTE DIRECTED TO DISPOSAL (ESRS E5-5)

As described above, the Oryx Stainless Group's business model is firmly rooted in circular economy principles. All upstream metal waste generated by the Group is diverted from disposal, as it represents a valuable secondary raw material that is fully recycled and used in the production of new stainless steel. Consequently, no upstream metal waste is directed to disposal.

Waste directed to disposal therefore relates exclusively to downstream general waste. In 2024, total downstream general waste amounted to 313.22 metric tons. Of this volume, 18.39 metric tons, corresponding to waste code 20 01, were diverted from disposal through alternative treatment routes. As a result, a total of 294.83 metric tons of waste were directed to disposal during the reporting period.

At present, a detailed breakdown of disposal methods (such as incineration, landfill, or other disposal operations) is not yet available for the 2024 reporting year. The Group plans to further enhance data granularity in this area, and a more detailed allocation of waste disposal methods is intended to be included in the 2025 Sustainability Report.



SOCIAL / EMPLOYEE WELLBEING

GRI 401 EMPLOYMENT 2016
(ESRS S1)

401-1 NEW EMPLOYEE HIRES AND EMPLOYEE TURNOVER
(ESRS S1-6)

At the four operational entities included in this Sustainability Report, the Oryx Stainless Group employed a total of 224 employees at year-end 2024, excluding the entities in Poland and Malaysia, which were not yet operational. Of the total workforce, 71% were male and 29% were female, representing a slight increase in female representation compared to the 2023 reporting year. It should be noted that, in contrast to the 2023 Sustainability Report – where workforce figures were based on annual average full-time equivalent (FTE) data – the 2024 disclosures are based on end-of-year headcount, providing a more precise snapshot of the workforce at the close of the reporting period.

During the 2024 reporting year, the Group hired a total of 32 new employees, of whom 75% were male and 25% were female. The age distribution of new hires reflects a continued focus on attracting younger talent. Approximately 62.5% of new employees were under 30 years of age, 34.4% were between 30 and 50, and around 3% were older than 50. This represents a shift toward a younger intake compared to 2023 and supports long-term workforce development.

In 2024, a total of 28 employees left the Group, resulting in an overall employee turnover rate of 12.5%. This represents a slight increase compared to the previous year, when turnover was calculated based on average FTE figures. The Group continues to monitor turnover closely and has set the objective to reduce employee turnover in 2025 or, at a minimum, maintain it at a stable level, supported by ongoing initiatives aimed at employee engagement, development, and retention.

A detailed breakdown of new hires and employee departures by region, gender, and age group is provided in the table below.

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Table 16 Employment overview of the Oryx Stainless Group by location, gender, age, including turnover

	2023 (annual average FTE)					2024 (year-end headcount)				
	NLD	GER	THA	ESP	ORYX	NLD	GER	THA	ESP	ORYX
Workforce	59	45	102	10	216	69	47	98	10	224
Male	49 (83%)	38 (84%)	61 (60%)	7 (70%)	155 (72%)	56 (81%)	37 (79%)	58 (59%)	7 (70%)	158 (71%)
Female	10 (17%)	7 (16%)	42 (40%)	3 (30%)	61 (28%)	13 (19%)	10 (21%)	40 (41%)	3 (30%)	66 (29%)
Hiring (gender)	9 (100%)	3 (100%)	47 (100%)	5 (100%)	64 (100%)	14 (100%)	8 (100%)	9 (100%)	1 (100%)	32 (100%)
Male	6 (67%)	3 (100%)	42 (89%)	3 (60%)	54 (84%)	11 (79%)	7 (88%)	5 (56%)	1 (100%)	24 (75%)
Female	3 (33%)	- (0%)	5 (11%)	2 (40%)	10 (15%)	3 (21%)	1 (13%)	4 (44%)	- (0%)	8 (25%)
Hiring (age)	9 (100%)	3 (100%)	47 (100%)	5 (100%)	64 (100%)	14 (100%)	8 (100%)	9 (100%)	1 (100%)	32 (100%)
<30 years	6 (67%)	1 (33%)	10 (21%)	1 (20%)	18 (28%)	9 (64%)	5 (63%)	6 (67%)	- (0%)	20 (63%)
30-50 years	3 (33%)	1 (33%)	34 (72%)	2 (40%)	40 (63%)	5 (36%)	2 (25%)	3 (33%)	1 (1%)	11 (34%)
>50 years	- (0%)	1 (33%)	3 (6%)	2 (40%)	6 (9%)	- (0%)	1 (13%)	- (0%)	- (0%)	1 (3%)
Turnover rate	7.5%	10.6%	12.7%	20.0%	11.2%	17.4%	10.6%	10.2%	10.0%	12.5%
Employee departures	4.4	4.75	13.0	2.0	24.15	12	5	10	9	28

We continuously seek both emerging talent and experienced professionals with leadership capabilities to strengthen our teams across different functions and regions. We place strong emphasis on fostering collaboration and cohesion within individual entities as well as across the Group, with the objective of positioning Oryx Stainless as an attractive employer. By monitoring new hires and employee turnover, we regularly refine our recruitment and retention approaches to support the development of a motivated, diverse, and engaged workforce.



GRI 403 OCCUPATIONAL HEALTH AND SAFETY 2018 (ESRS S1)

403-1 OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM (ESRS S1-1)

At the Oryx Stainless Group, maintaining a safe and healthy working environment remains a core priority, consistent with the approach described in the 2023 Sustainability Report. The Group operates a comprehensive Occupational Health and Safety (OHS) Management System certified under ISO 45001, which provides a structured framework for managing and continuously improving workplace safety. In addition, the Group maintains certifications under ISO 9001 for quality management and ISO 14001 for environmental management, underscoring its integrated approach to operational excellence and sustainability.

In line with ISO 45001 requirements, comprehensive risk assessments are carried out across a wide range of operational areas. These include, among others, workplace activities, welding operations (including TIG welding), the use of electrical hand tools, sampling activities, rail work, crushers, ladder handling, office administration, and truck transportation. Each activity is systematically assessed to identify potential hazards and to ensure appropriate protective measures are in place for both employees and, where applicable, the employees of customers.

To uphold high safety standards, all machinery is inspected and maintained either annually or in accordance with defined maintenance schedules. This preventive maintenance approach supports the early identification of potential risks, helps prevent accidents, and ensures reliable and safe operations. Through continuous training, strict adherence to safety procedures, and the consistent application of ISO standards, the Group seeks to minimize risks and promote a strong safety culture across all entities.

403-2 HAZARD IDENTIFICATION, RISK ASSESSMENT, AND INCIDENT INVESTIGATION (ESRS S1-3)

The Oryx Stainless Group remains committed to safeguarding employee health and safety through systematic processes for hazard identification, risk assessment, and incident investigation, as already established in the 2023 reporting year. These processes are fully embedded within the Group's ISO 45001-certified OHS Management System, which requires regular reviews and annual surveillance audits to ensure ongoing compliance and continuous improvement.



Hazard identification and risk assessments address both routine and non-routine activities. Routine tasks are assessed on a regular basis, taking into account changes in operational conditions and work environments. For non-routine or exceptional activities, specific risk assessments are conducted prior to execution, with a strong focus on employee protection. Employees actively contribute to this process by reporting hazards and unsafe situations, reinforcing a participatory approach to workplace safety and risk prevention.

In the event of an incident, investigations are carried out by dedicated Occupational Safety Specialist to identify root causes and define corrective and preventive measures. The findings are used to reduce the likelihood of recurrence and to further strengthen the Group's safety management practices.

403-3 OCCUPATIONAL HEALTH SERVICES (ESRS MDR)

Occupational health services continue to play a key role in supporting a safe and healthy workplace by identifying potential health risks, reducing exposures, and promoting employee well-being. As in previous years, these services form an integral part of the Group's broader OHS strategy and support the proactive management of work-related health risks.

The occupational health program includes regular occupational medical examinations as well as assessments related to psychological stress, addressing both physical and mental well-being. In addition, appropriate personal protective equipment (PPE) is provided for all relevant tasks, supported by clear safety signage to raise awareness of hazards and required protective measures. Strict hygiene standards are maintained across operations, contributing to a safe, healthy, and supportive working environment.

403-4 WORKER PARTICIPATION, CONSULTATION, AND COMMUNICATION ON OCCUPATIONAL HEALTH AND SAFETY (ESRS MDR)

Effective communication and employee involvement remain central elements of the Group's OHS approach, in line with practices applied in 2023. Mandatory safety training sessions are conducted at least once annually for all employees, in accordance with legal requirements and the enhanced standards set by ISO 45001, ensuring that employees remain informed about current safety practices and expectations.



The Group's OHS structure includes, as aforementioned, a dedicated Occupational Safety Specialist, who ensures alignment with overarching safety objectives, as well as appointed Safety Officers responsible for specific safety areas within the organization. These roles actively contribute to the development, implementation, and evaluation of safety policies and facilitate access to relevant OHS information for employees. Through this structured and participatory framework, the Group continues to promote a culture of safety, engagement, and continuous improvement.

403-5 WORKER TRAINING ON OCCUPATIONAL HEALTH AND SAFETY (ESRS 2 MDR)

Please refer to GRI 404-1 Average hours of training per year per employee.

403-8 WORKERS COVERED BY AN OCCUPATIONAL HEALTH AND SAFETY MANAGEMENT SYSTEM (ESRS S1-14)

As described in the 2023 Sustainability Report, occupational health and safety management systems are implemented across the Oryx Stainless Group, although not all operational sites are yet covered by ISO 45001 certification. In the 2024 reporting period, approximately 75% of the Group's operational sites are covered by ISO 45001 (calculated using the total volume of recycled material as the denominator), representing a stable level of coverage compared to the previous year.

Based on the number of employees, ISO 45001 coverage increased to 52% in 2024, compared to 48% in 2023, reflecting an improvement in workforce coverage under certified OHS management systems. While not all sites are certified, all operational entities continue to apply core OHS practices, including the tracking of work-related accidents and injuries, the performance of regular risk assessments, the delivery of ongoing safety training and instructions, and the routine maintenance of equipment and machinery.

The Group continues to work toward expanding ISO 45001 certification across all operational entities. The objective remains to achieve full ISO 45001 certification for all operational sites by the end of 2025, including the new operation in Malaysia, once operations commence.



403-9 WORK-RELATED INJURIES
(ESRS S1-14)

Occupational Health and Safety is a fundamental priority at the Oryx Stainless Group, and safeguarding the well-being of employees remains an integral part of daily operations. Given the operational nature of the Group’s activities, the risk of work-related injuries cannot be fully eliminated; however, the Group continues to place strong emphasis on prevention, awareness, and continuous improvement in occupational health and safety performance.

To support this approach, all employees receive occupational health and safety training at least once annually, ensuring awareness of workplace risks and safe working practices (please refer to GRI 403-5 Worker training on occupational health and safety and GRI 404-1 Average hours of training per year per employee). In addition, incidents are systematically analyzed to identify underlying causes and to define corrective and preventive measures. The most frequently observed injury types during the reporting period were associated with materials handling activities and quality inspection processes, reflecting core operational tasks within the Group. No fatal work-related injuries occurred.

The Group monitors key safety indicators, including the Lost Time Injury Frequency Rate (LTIFR) and the Lost Time Injury Severity Rate (LTISR), calculated per 200,000 working hours. These indicators are used as management tools to identify areas requiring additional attention and to strengthen preventive measures, rather than as standalone performance indicators. Individual incidents are reviewed in detail by dedicated health and safety personnel, and lessons learned are incorporated into updated procedures, training content, and operational controls.

The LTIFR and LTISR figures presented in the table below form part of this continuous improvement cycle and support the Group’s objective of further strengthening occupational health and safety standards across all entities. Increased transparency and consistent reporting remain key elements of the Group’s approach to managing occupational health and safety risks.

Table 17 Lost time injury frequency and severity rates of the Oryx Stainless Group

	GROUP	
	2023	2024
Total hours worked	397,649	439,950
Number of injuries (lost time >1 day)	4	10
LTIFR	2.01	4.55
LTISR	11.07	41.28



GRI 404 TRAINING AND EDUCATION 2016 (ESRS S1/2)

404-1 AVERAGE HOURS OF TRAINING PER YEAR PER EMPLOYEE (ESRS S1-13)

Oryx Stainless is committed to continuous employee development through a comprehensive range of training programs covering vital areas to enhance skills and knowledge (please refer to GRI 404-2 Programs for upgrading employee skills and transition assistance programs for a more detailed overview of topics covered).

The table below shows the average hours of training provided to employees of the Oryx Stainless Group in the reporting period.

Table 18 Hours of training provided to Oryx employees

	GROUP	
	2023	2024
Hours of training provided	1,067	712
Number of employees	216	224
Hours of training per employee	4.94	3.18

Employee training at the Oryx Stainless Group continues to cover a range of key development areas, consistent with the approach described in the 2023 Sustainability Report. Training programs are structured across several main categories, including Business Ethics, Cybersecurity, Environment, and Occupational Health and Safety (OHS). In addition, an “Other” category captures further training activities, such as risk assessment, accounting- and finance-related topics, and other role-specific professional development measures.

In the 2024 reporting year, the Group placed increased emphasis on achieving a more balanced distribution of training efforts across the different categories. This shift is reflected in the table below, which illustrates the allocation of employee training across the Oryx Stainless Group.

Table 19 Provided hours of training by category

	GROUP			
	2023		2024	
Training on	Hours	% of training	Hours	% of training
Business Ethics	49.0	4.6	40.0	33.4
Cybersecurity	62.1	5.8	75.5	10.6
Environment	46.0	4.3	164.5	23.1
Occupational Health & Safety	661.5	62.0	238.0	33.4
Others	248.5	23.3	194.0	27.2
Total	1067.1	100.0	712.0	100.0



404-2 PROGRAMS FOR UPGRADING EMPLOYEE SKILLS AND TRANSITION ASSISTANCE PROGRAMS (ESRS S1-1)

As in previous years, and consistent with the approach outlined in the 2023 Sustainability Report, the Oryx Stainless Group offers a range of targeted training programs designed to support professional development and enhance employee skills. These programs are intended to strengthen individual capabilities and ensure that employees are well equipped to meet the evolving requirements of their roles.

In addition to regular occupational health and safety training, the Group provides courses on business ethics, cybersecurity, and risk management, reinforcing responsible conduct, data protection awareness, and effective risk identification and mitigation. Accounting- and finance-related training is also offered to support employees in strengthening their understanding of financial processes, compliance requirements, and cost awareness, thereby enhancing cross-functional collaboration and decision-making quality. Environmental training remains an important element, supporting the Group's sustainability objectives and improving employees' awareness of environmentally responsible practices.

Through the implementation of these programs, the Group ensures that employees have access to relevant knowledge and development opportunities, enabling them to grow within their roles and adapt to changing business and industry demands.

404-3 PERCENTAGE OF EMPLOYEES RECEIVING REGULAR PERFORMANCE AND CAREER DEVELOPMENT REVIEWS (ESRS S1-13)

At the Oryx Stainless Group, all employees across all operational entities receive regular performance and career development reviews. Performance-related discussions take place continuously throughout the year as part of day-to-day management and ongoing feedback processes, even where these exchanges are not always formally documented.

In addition, each employee participates in at least one formal performance and career development review per year. These discussions provide structured feedback on individual performance, identify development needs, and address career progression opportunities. This approach applies equally to all employees, regardless of gender, age, employment type (full-time or part-time), or contract status.

As a result, the percentage of employees receiving regular performance and career development reviews is 100% for the reporting period.



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GRI 308 SUPPLIER ENVIRONMENTAL ASSESSMENT 2016 (ESRS G1)

308-1 NEW SUPPLIERS THAT WERE SCREENED USING ENVIRONMENTAL CRITERIA (ESRS G1-2)

At Oryx Stainless, all new suppliers are subject to a structured verification process that is regularly reviewed and adapted to reflect market developments, consistent with the approach described in the 2023 Sustainability Report. This process includes a comprehensive assessment of environmental criteria to ensure alignment with the Group's sustainability objectives. As part of this, we require new suppliers to complete a KYC process, or Vendor Due Diligence, respectively.

The environmental screening criteria require suppliers to demonstrate an appropriate understanding of environmental risks, impacts, and responsibilities associated with their activities and products. Suppliers are expected to have an environmental policy, statement, or program in place to address identified environmental risks and to demonstrate compliance with applicable environmental laws and regulations, including the possession of required permits, approvals, and registrations.

By incorporating these criteria, we ensure that our partners contribute positively to environmental sustainability and uphold practices that align with the Group's dedication to responsible sourcing and environmental stewardship.

Each new potential supplier passes through the KYC process (applied as Vendor Due Diligence for suppliers) involving four key steps: Questionnaire, Risk Evaluation, Documentation, and Sign-off.

Questionnaire: The trader initiates contact by sending a questionnaire to potential suppliers, requesting identification and qualification details. The completed information is returned to the employee responsible for onboarding (e.g., finance manager or purchase administrator).

Risk Evaluation: The responsible onboarding employee assesses the business category and country risk, defining the necessary documentation and evaluating available information to determine any potential risks.

Documentation: Missing information is identified, and specific requests are made to the trader to collect additional details from the supplier. The onboarding employee compiles the final assessment as a decision proposal and forwards it for director approval.



Sign-off: A non-purchasing director reviews and either approves or declines the new supplier. Once approved, the supplier is entered into the ERP system, ready for contract engagements. All decisions, whether positive or negative, are documented for record-keeping.

The following table shows an overview of the percentage of new suppliers that were screened using environmental and social criteria in the reporting period. In 2024, the Oryx Stainless Group significantly increased the share of new suppliers screened against environmental and social criteria, rising from 61.7% in 2023 to 93.7% in the reporting year. This substantial improvement reflects the strengthening of the Group’s supplier onboarding processes and its increased focus on sustainability-related risk management within the supply chain.

Table 20 Supplier screening of Oryx using environmental and social criteria

Percentage of new suppliers screened using environmental and social criteria	GROUP
2023	61.7%
2024	93.7%

308-2 NEGATIVE ENVIRONMENTAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN
(ESRS SBM-3)

As in the 2023, no negative environmental impacts were identified within the Oryx Stainless Group’s supply chain during the 2024 reporting period, either in relation to new suppliers or existing business partners. Consequently, no corrective actions were required. The Group continues to rely on proactive monitoring and close cooperation with suppliers to uphold environmental standards and to address potential risks at an early stage.

GRI 414 SUPPLIER SOCIAL ASSESSMENT 2016
(ESRS G1)

414-1 NEW SUPPLIERS THAT WERE SCREENED USING SOCIAL CRITERIA
(ESRS G1-2)

In addition to environmental criteria outlined in the KYC process (applied as Vendor Due Diligence for suppliers) (please refer to 308-1 New suppliers that were screened using environmental criteria), the Group applies stringent social criteria when onboarding new suppliers to ensure ethical practices and human rights adherence.



Suppliers must demonstrate commitment to:

Freedom from forced labor, bonded labor, and human trafficking: Employment must be freely chosen, without coercion or debt bondage

Fair compensation: Work must not be undertaken to repay debts and should be compensated fairly

Prohibition of child labor: Compliance with local laws on minimum working age, avoiding direct or indirect child employment

Health and safety: Maintaining safe working conditions for all employees

The Oryx Stainless Group upholds a Supplier Code of Conduct, which sets out clear social standards and expectations for responsible business behavior and is available to all current and prospective suppliers. As outlined in the 2023 Sustainability Report, the Code of Conduct is regularly reviewed and updated. Since the third quarter of 2024, the Group's entities require new suppliers to formally acknowledge and sign the Supplier Code of Conduct as part of the onboarding process, and suppliers are generally accepted only upon receipt of a signed document.

In specific operational contexts, particularly where entities work with smaller or locally based suppliers for limited or specialized services, the Group applies a risk-based and proportionate approach. In these cases, social and environmental criteria are assessed through the KYC (Vendor Due Diligence) process, even where a formal signature of the Supplier Code of Conduct is not required. This approach ensures that social standards are maintained while allowing flexibility to reflect local market structures and operational realities.

In addition to the social criteria embedded in the KYC process and the Supplier Code of Conduct, the Group conducts ongoing sanctions screening against recognized international sanctions lists, including those issued by OFAC, the United Kingdom, and the European Union. These checks support the identification and mitigation of potential social and legal risks within the supply chain.

For an overview of the number of suppliers that were verified by KYC taking into account social criteria, please refer to 308-1 New suppliers that were screened using environmental criteria. An overview of the share of new suppliers that signed and acknowledged the Supplier Code of Conduct during the reporting period is provided in the table below. It is expected that this share will increase significantly in 2025, as the requirement for signed acknowledgment continues to be embedded more consistently across all operational entities.



2024	GROUP
Percentage of new suppliers that signed the Supplier Code of Conduct	22.3%

**414-2 NEGATIVE SOCIAL IMPACTS IN THE SUPPLY CHAIN AND ACTIONS TAKEN
(ESRS SBM-3)**

As in the 2023, no negative social impacts were identified within the Oryx Stainless Group’s supply chain during the 2024 reporting period, either in relation to new suppliers or existing business partners. As a result, no corrective actions were required. The Group continues to emphasize proactive monitoring, regular supplier engagement, and the application of its Supplier Code of Conduct and KYC processes (applied as Vendor Due Diligence for suppliers) to uphold social standards and to identify potential risks at an early stage.

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GRI CONTENT INDEX

GRI 1: FOUNDATION 2021

The Oryx Stainless Group has reported in accordance with the Global Reporting Initiative (GRI) standards for the period from 01.01.2024 to 31.12.2024. There was no external audit of the report.

GRI 2: GENERAL DISCLOSURES

GRI Disclosure	Page*	ESRS Reference	Additional information
2-1 Organizational Details	6	ESRS 2	
2-2 Entities included in the organization's sustainability reporting	7	ESRS 2 BP-1	
2-3 Reporting period, frequency and contact point	7	ESRS 1	
2-4 Restatements of information	7	ESRS 2 BP-2	
2-5 External Assurance	8	-	
2-6 Activities, value chain and other business relationships	9	ESRS 2 SBM-1	
2-7 Employees	11	ESRS S1-6/9/12	
2-8 Workers who are not employees	14	-	KPI not assessed
2-9 Governance structure and composition	14	ESRS 2 GOV-1, ESRS G1	
2-10 Nomination and selection of the highest governance body	14	-	
2-11 Chair of the highest governance body	15	-	
2-12 Role of the highest governance body in overseeing the management of impacts	15	ESRS 2 GOV-1/2, SBM-2, ESRS G1	
2-13 Delegation of responsibility for managing impacts	16	ESRS 2 GOV-1/2, ESRS G1-3	

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GRI Disclosure	Page*	ESRS Reference	Additional information
2-14 Role of the highest governance body in sustainability reporting	17	ESRS 2 IRO-1, GOV-5	
2-15 Conflicts of interest	17	-	
2-16 Communication of critical concerns	17	ESRS 2 GOV-2, ESRS G1-1/3	
2-17 Collective knowledge of the highest governance body	18	ESRS 2 GOV-2	
2-18 Evaluation of the performance of the highest governance body	-	-	Not disclosed
2-19 Remuneration policies	See FS	ESRS 2 GOV-3, ESRS E1	Not disclosed
2-20 Process to determine remuneration	See FS	ESRS 2 GOV-3	Not disclosed
2-21 Annual total compensation ratio	-	ESRS S1-16	Not assessed
2-22 Statement on sustainability development strategy	20	ESRS 2 SBM-1	
2-23 Policy commitments	21	ESRS 2 GOV-4, MDR-P, ESRS S1-1/2-1/3-1/4-1, G1-1	
2-24 Embedding policy commitments	23	ESRS 2 GOV-2, MDR-P, ESRS S1-4/2-4/3-4/4-4, G1-1	
2-25 Processes to remediate negative impacts	23	ESRS S1-1/2-1/3-1/4-1	
2-26 Mechanisms for seeking advice and raising concerns	24	ESRS S1-3/2-3/3-3/4-3, G1-1	
2-27 Compliance with laws and regulations	24	ESRS 2 SMB-3, ESRS E2-4, S1-17, G1-4	
2-28 Membership associations	24	ESRS 2 MDR	
2-29 Approach to stakeholder engagement	26	ESRS 2 SMB-2, ESRS S1-1/2-1/3-1/4-1	
2-30 Collective bargaining agreements	27	ESRS S1-8	



GRI 3: MATERIAL TOPICS 2021

GRI Disclosure	Page	ESRS Reference	Additional information
3-1 Process to determine material topics	27	ESRS 2 BP-1, IRO-1	
3-2 List of material topics	28	ESRS 2 SBM-3	
3-3 Management of material topics (ESRS 2 SBM-1/3, MDR, ESRS 1 S1-2/2-2/3-2/4-2)			
3-3-1 Management of material environmental topics	34	ESRS 2 IRO-1	
3-3-2 Management of material social topics	35	ESRS 2 IRO-1	
3-3-3 Management of material governance topics	37	ESRS 2 IRO-1	

ENVIRONMENT / CIRCULARITY

GRI Disclosure	Page	ESRS Reference	Additional information
GRI 301 Materials 2016 (ESRS E5)			
301-1 Materials used by weight or volume	38	ESRS E5-4	Due to confidentiality the exact amount of recovered material will not be disclosed
301-2 Recycled input materials used	39	ESRS E5-4/5	The share of recycled input materials used is near 100%, the exact share, however, is not disclosed due to confidentiality
GRI 302 Energy 2016 (ESRS E1)			
302-1 Energy consumption within the organization	39	ESRS E1-5	Values regarding the Spanish entity for 2023 are approximates as they receive annual invoices
302-3 Energy intensity	41	ESRS E1-5	
GRI 303 Water and Effluents 2018 (ESRS E3)			
303-5 Water consumption	41	ESRS E3-4	Values regarding the Spanish entity for 2023 are approximates as they receive annual invoices
GRI 305 Emissions 2016 (ESRS E1)			
305-1 Direct (Scope 1) GHG emissions	42	ESRS E1-4	

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GRI Disclosure	Page*	ESRS Reference	Additional information
305-2 Energy indirect (Scope 2) GHG emissions	44	ESRS E1-4	Values regarding the Spanish entity or 2023 are approximates as they receive annual invoices
305-3 Other indirect (Scope 3) GHG emissions	44	ESRS E1-4	
305-4 GHG emissions intensity	45	ESRS E1-6	
GRI 306 Waste 2020 (ESRS E5)			
306-1 Waste generation and significant waste-related impacts	46	ESRS 2 SBM-3, ESRS E5-4	
306-3 Waste generated	47	ESRS E5-5	
306-4 Waste diverted from disposal	48	ESRS E5-5	Detailed breakdown of waste diversion methods not available for 2024; expanded disclosure planned for 2025 reporting
306-5 Waste directed to disposal (ESRS E5-5)	49	ESRS E5-5	Detailed breakdown of waste disposal methods not available for 2024; expanded disclosure planned for 2025 reporting

SOCIAL / EMPLOYEE WELLBEING

GRI Disclosure	Page	ESRS Reference	Additional information
GRI 401 Employment 2016 (ESRS S1)			
401-1 New employee hires and employee turnover	50	ESRS S1-6	
GRI 403 Occupational Health and Safety 2018 (ESRS S1)			
403-1 Occupational health and safety management system	52	ESRS S1-1	
403-2 Hazard identification, risk assessment, and incident investigation	52	ESRS S1-3	
403-3 Occupational health services	53	ESRS MDR	

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GRI Disclosure	Page*	ESRS Reference	Additional information
403-4 Worker participation, consultation, and communication on occupational health and safety	53	ESRS MDR	
403-5 Worker training on occupational health and safety	54	ESRS MDR	
403-8 Workers covered by an occupational health and safety management system	54	ESRS S1-14	
403-9 Work-related injuries	55	ESRS S1-14	

GRI 404 Training and Education 2016 (ESRS S1/2)

404-1 Average hours of training per year per employee	56	ESRS S1-13	
404-2 Programs for upgrading employee skills and transition assistance programs	57	ESRS S1-1	
404-3 Percentage of employees receiving regular performance and career development reviews (ESRS S1-13)	57	ESRS S1-13	

GOVERNANCE / BUSINESS INTEGRITY

GRI Disclosure	Page	ESRS Reference	Additional information
GRI 308 Supplier Environmental Assessment 2016 (ESRS G1)			
308-1 New suppliers that were screened using environmental criteria	58	ESRS G1-2	Absolute number of suppliers screened not disclosed due to confidentiality
308-2 Negative environmental impacts in the supply chain and actions taken	59	ESRS 2 SBM-3	
GRI 414 Supplier Social Assessment 2016 (ESRS G1)			
414-1 New suppliers that were screened using social criteria	59	ESRS G1-2	Absolute number of suppliers screened not disclosed due to confidentiality
414-2 Negative social impacts in the supply chain and actions taken	61	ESRS 2 SBM-3	



ORYX STAINLESS GROUP

ORYX STAINLESS HOLDING BV

's Gravendeelsedijk 159
3316 AS Dordrecht
The Netherlands

ORYX STAINLESS BV

's Gravendeelsedijk 175
3316 AS Dordrecht
The Netherlands

ORYX STAINLESS AG

Rheinstrasse 97
45478 Mülheim an der Ruhr
Germany

ORYX STAINLESS ESPANA S.L.U.

Avenida Córdoba 19
11314 San Roque, Cádiz
Spain

ORYX STAINLESS THAILAND CO., LTD.

92/8-9 Moo 1, Tambol Homsin,
Amphur Bangpakong,
Chachoengsao, Thailand 24130

ORYX STAINLESS MALAYSIA SDN. BHD.

(201101030835) / (958970-U)
PTD 4692, Jalan Rumbia 4
Kawasan Perindustrian Tanjung Langsat
81700 Pasir Gudang
Johor, Malaysia