

# Sustainability Report 2024

Sustainable manufacturing

Supporting our partners, people and the planet

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# Introduction

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# Preparation for the Corporate Sustainability Reporting Directive (CSRD)

**W**e are pleased to present our latest developments and initiatives as part of our sustainability strategy. Since being acquired by FMC Industrial GmbH on July 1st, 2021, sustainability has become one of our guiding principles. The ongoing energy crisis, along with the new EU Directive on Sustainability Reporting (CSRD) and the European Sustainable Reporting Standards (ESRS), is both driving and further shaping our efforts. ESG not only promotes greater transparency and balanced disclosure of sustainability information, but also strengthens our internal processes and management structures.

## Our sustainability strategy

Starting in 2023, we began combining all our management systems under the headline of ESG. This includes health and safety, risk management, quality management, environmental management, supply chain management, compliance management, and cybersecurity management. All of these are now part of our ESG reporting and monitoring system. To achieve this, we are working closely with partners like ESG. DNA GmbH (Starboard Tools Software) and the Effizienz Agentur NRW (ecocockpit).

## Voluntary sustainability reporting

Even though we are not currently obliged to report according to the CSRD reporting require-

ments, we have decided to proactively prepare a sustainability report in accordance with the European Sustainability Reporting Standards (ESRS). Our goal is to implement the essential structures at an early stage and to be well prepared for future requirements.

This report demonstrates our commitment to ecological, social and economic responsibility. By aligning ourselves with the industry and European standards, we offer our stakeholders transparent insights into our sustainable business strategy. This is how we strengthen trust and emphasise our commitment to society and the environment.

## Double materiality analysis (DWA)

Our double materiality analysis was conducted in accordance with the European Sustainable Reporting Standards (ESRS) as outlined in Implementation Guidance, EFRAG IG 1, Materiality Assessment. Doing so we made targeted strategic decisions to clearly define the focus.

**Thomas Seitz**  
Director

Person responsible for our sustainability strategy

**This report  
demonstrates  
our  
commitment  
to ecological,  
social and  
economic  
responsibility**

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## Our vision

Our vision at DRADURA is to be a leading provider of durable and sustainable components and assemblies applied in consumer products worldwide. We are specialized in wire solutions for the household appliances, bath and furniture accessories as well as other specialized industries, making a significant contribution to environmentally friendly production in Europe and North America. We strive to develop innovative and resource-saving processes that both meet the highest quality standards and minimise the impact on the environment.

We rely on production that combines ecological responsibility, social consideration and strict governance standards. Sustainability is not only anchored in our products, but also in our actions. We actively promote environmentally conscious behaviour in our workforce through clear guidelines that support sustainable processes and energy savings.

Our commitment to transparency is reflected in our regular reporting, in which we document our progress and successes in achieving our sustainability goals. With these measures, we want to play an exemplary role in responsible corporate behaviour not only today but also in the future.



**Reducing CO<sub>2</sub> emissions**



**Sustainable supply chain**



**100% Compliance**



**Social responsibility**



**Sustainable products**



**Climate friendly transportation and packaging**

# Our vision



## Reducing CO<sub>2</sub> emissions

Our goal is to reduce the CO<sub>2</sub> emissions (scope 1 & 2) of our entire business operations by 50% by 2030 (base year 2023) while simultaneously increasing energy efficiency at all locations. We strive to significantly reduce our environmental footprint and continue to grow economically. This includes increasing our use of renewable energies by utilising solar energy and other green energy sources in our business premises. Our goal is to switch to green electricity at all our locations and to enlarge the share of productions processes which are using electrical energy only.



## Sustainable supply chain

We have set ourselves the goal of consistently making our supply chain more sustainable. To this end, we are working with our suppliers and their subcontractors to continuously secure a binding code of conduct that guarantees the highest environmental and social standards. We target a minimum 15% CO<sub>2</sub> reduction within scope 3 by 2030 (base year 2023).



## 100% Compliance

Our organization, control mechanisms including a whistle-blowing system assure compliance with all laws and regulations as well as the DRADURA philosophy, code of conduct and values. This includes continuous trainings, transparent information and involvement of major stakeholders like employees.



## Social responsibility

Besides assuring high social standards within our supply chain we permanently monitor all effects from our business on communities, customers and consumers. We have implemented effective control measures to assure the highest quality standards and permanent improvements by for example minimization of parts per million (ppm) ratios, number of quality incidents, number of safety incidents.



## Sustainable products

Together with our customers we focus on promoting sustainable products and on developing a recycling scheme for our products which we are currently working on. In this way, we actively contribute to reducing our customers' environmental impact in the long term.



## Climate-friendly transportation and packaging

We are working on making our transportation more sustainable by switching to electric company vehicles and motivating our freight partners to accordingly switch to sustainable logistics (land and sea). Our aim is to establish environmentally friendly packaging materials in our logistics and warehousing by increasing our use of recycled and biodegradable materials and drastically reducing our use of disposable materials.

# General

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## Our locations

### DRADURA Group GmbH Altleiningen, Germany



DRADURA Group GmbH Headquarter  
Talstraße 267317, Altleiningen  
Germany  
Tel.: +49 6356 966-0

DRADURA'S history dates back 600 years, beginning with copper and iron ore mining in the Altleiningen Valley. In 1729, Johann Nikolaus II Gienanth began producing iron parts. In 1811, Napoleon Bonaparte granted approval to start wire drawing production. In 1941, the Stein family acquired the company, which at the time mainly produced rawl plugs and chains. In 1957, DRADURA shifted its focus to wire products, followed by the production of dishwasher baskets in 1962.

After being sold to Emaram in 2016, in 2021 FMC Industrial acquired all DRADURA operations in Germany, as well as its Italian, Polish, and U.S. branches. DRADURA has since become a major international producer of wire-based products with diverse surface options.

DRADURA Altleiningen: This site specializes in high-volume dishwasher basket production, processing around 2,500 tons of steel annually. DRADURA prioritizes resource-efficient production to minimize CO<sub>2</sub> emissions and optimize raw material use. However, due to current market challenges and reduced demand, the site closed production on December 31, 2024.

### DRADURA Italia Conzano and San Donà di Piave, Italy



DRADURA Italia S.R.L.  
COME: Via Monferrato 4, 15030 Conzano (AL)  
OMIM: Via J. F. Kennedy 8, 830027 San Donà Di Piave (VE)  
Tel.: +39 0421 497-511 (OMIM); +39 0142 925-545 (COME)

Part of the DRADURA Group since 2006, DRADURA Italia operates two sites with over 50 years of wire processing experience. The Conzano site produces polyamide-coated dishwasher baskets and stainless-steel baskets for specialized industries, emphasizing sustainability through eco-friendly materials and energy-efficient processes.

At the site in San Donà di Piave, the focus is on the zinc and nickel/chrome plating of wire products and also their coating with lacquer, power, polyester. Our sustainability focus lies especially on the galvanizing lines as these lines have a major environmental, health and safety and regulative impact.



## Our locations

### DRADURA Polska

Łódź, Poland



DRADURA Polska  
ul. Techniczna 8/10, 92-518 Łódź  
Poland  
Tel.: +48 42 2542-000

DRADURA Polska in Łódź is the largest DRADURA production site, specializing in wire products like dishwasher baskets and oven shelves. Since 2004, it has been a key supplier to major appliance manufacturers. With over 450 employees, the site prioritizes sustainability, using energy-efficient technologies and minimizing environmental impact through waste reduction and resource efficiency.

### DRADURA USA

New Bern, North Carolina, United States of America



DRADURA USA  
197 Bosch Blvd., New Bern NC 28562  
United States of America  
Tel.: +1 252 637-9660

Established in 2009, DRADURA USA is a key manufacturer of wire products for the U.S. household appliance industry, focusing on polyamide-coated dishwasher baskets. Despite improvements in performance and efficiency, the site faces market decline and rising cost pressure. As a result, DRADURA USA closed production on December 31, 2024, but we are maintaining our presence in North America as a sales and distribution entity.

## Our certificates and memberships

At DRADURA, we recognize the importance of sustainable practices and a commitment to quality, safety, and compliance. In line with our dedication to environmental stewardship and corporate responsibility, we are certified according to ISO 9001 (Quality Management), ISO 14001 (Environmental Management), and maintain an annually certified Risk Management System to ensure we continually monitor and mitigate potential risks.

In addition to these certifications, we are fully compliant with RoHS (Restriction of Hazardous Substances) and REACH (Registration, Evaluation, Authorization, and Restriction of Chemicals) regulations.

Furthermore, we are a member of APPLiA, a leading industry association based in Brussels that represents the household appliances sector. Household appliances is one of Europe's largest manufacturing sectors, playing a crucial role in both the economy and the everyday lives of consumers.

These frameworks demonstrate our commitment to environmental safety by ensuring that hazardous substances are minimized in our products and that we are transparent in the management of chemicals used in our production processes.

### Forward-Looking Approach: Strategic Risk Management

At DRADURA, we take a proactive and strategic approach to managing sustainability and ES-G-related risks. We use industry-specific solutions to help identify and address material risks early – ensuring compliance, resilience, and long-term value creation.



**ISO 9001:2015**  
Certified



**REACH**  
Compliant



**ISO 14001:2015**  
Certified



**RoHS**  
Compliant



## Our products and sustainability

**WET**

### Wire solutions for dishwashers

Our wire solutions for dishwashers are among the most advanced and durable in our range, with sustainability at the core of their design and production. We focus on using environmentally friendly coating materials, minimizing transport emissions by producing near customer sites, increasing reusable packaging, and collaborating on recycling systems – all to enhance the environmental performance and longevity of our products.

**HOT**

### Wire solutions for stoves, ovens, grills, microwaves

Our wire solutions for stoves, ovens, grills and microwaves are designed to meet the highest standards of heat resistance and durability as well as food safety. Sustainability is at the heart of our production processes. To ensure that the surfaces of our wire products remain resistant to extreme temperature fluctuations and corrosion, we use environmentally friendly materials and coatings that guarantee a long service life. Especially abandoning Chrome (VI) improves health and safety and environmental impact of our coating processes.



# Our products and sustainability

## BATH

### Wire solutions for baths and furniture

Midterm life cycles and high-quality requirements characterize the sectors of bath and furniture. In contrast to the products for dishwashers and ovens, these products are much less restrained by functional and technical requirements. However, design and aesthetics are of high importance and subject to changes in taste. Additionally, this business is characterized by high customer requirements concerning packaging and logistics. Extending the use of wire from recycled steel and prospectively green steel are main targets in this segment.

## COLD

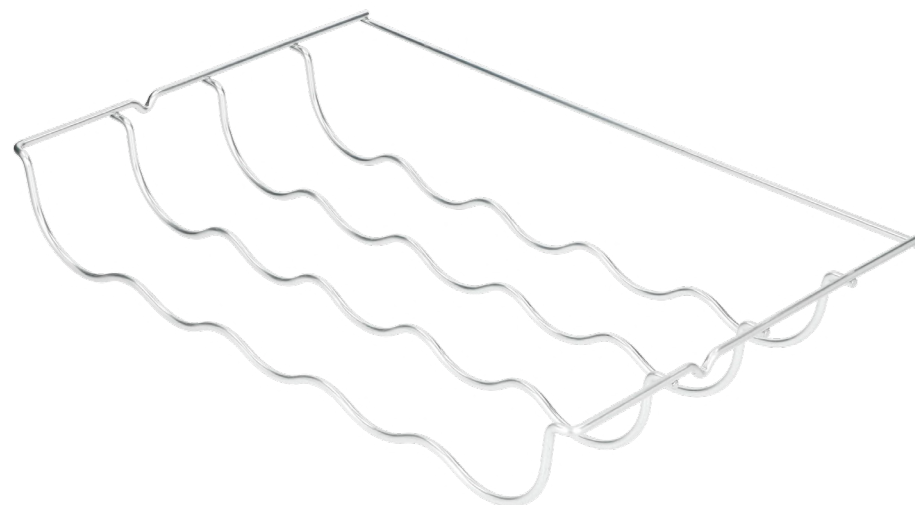
### Wire solutions for refrigerators and freezers

Our wire solutions for the sub-segment COLD show a wide variety of coating alternatives to long term withstand the cooling and freezing environments within household and commercial application. Dradura Group can provide solutions from electroplating to polyolefin coating. In general, when manufacturing these wire items, we place particular emphasis on sustainability and durability.

## MEDICAL

### Wire solutions for the medical/industrial technology

DRADURA Group produces specialized washing baskets for medical products but also for other industrial applications. These products are characterized by a high requirement for customized solutions, be it technology for disinfection or individually produced and designed wire articles often made of electro-polished stainless steel.





## Our sustainability priorities

**A**t DRADURA Group, sustainability is a core element of our business strategy and one of our strategic principles. We are committed to providing solutions that not only meet customer needs but also foster economic, environmental, and social benefits.

We prioritize Environmental, Social, and Governance (ESG) issues in our operations. This involves reducing our ecological impact through efficient use of resources and sustainable practices, ensuring ethical treatment of employees and communities, and upholding strong corporate governance to maintain trust and transparency with all stakeholders.

To guide our sustainability efforts, we implanted a double materiality analysis, assessing how sustainability affects our business and how our operations impact society and the environment. This approach helps us identify risks and opportunities while ensuring that we are creating value through responsible practices and minimizing negative impacts.

We are mindful of our ecological, economic, and social responsibility as a global business. By innovating in sustainable manufacturing and focusing on fair labor practices, we aim to reduce our environmental footprint and contribute positively to the communities where we operate. Ultimately, we strive for sustainable growth that benefits all stakeholders. By integrating ESG factors into our business model, we aim to build a resilient company that not only thrives in a changing world but also contributes, more sustainable future for all.

**We prioritize  
Environmental,  
Social,  
and Governance  
issues in our  
operations.**

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# Our sustainability priorities (ESG)

## Environment

### Reduce CO2-Carbon Footprint

#### Approach

We are intensifying our efforts to reduce our CO2 emissions and at the same time developing effective strategies to minimise our energy consumption.

### Sustainable product offering

We want to make our supply chain more sustainable and constantly decrease the environmental impact of our products

#### Priorities

- Use of renewable energies
- Improvement of energy and process efficiency in our buildings and operations
- Use of environmentally friendly packaging materials, maximising recycling rates and reducing waste
- Switch to electric mobility
- Digitisation of workflows
- Careful selection of our suppliers, including on the basis of ecological aspects
- Commitment to a common sustainable code of conduct along the supply chain
- Use of recycled materials
- Convincing customers to switch to more sustainable materials where possible

## Social

### Health and Safety without compromise, ONE TEAM

#### Approach

Health and Safety First is one of our guiding principles

Our ONE TEAM principle assures cooperation, trust, fairness & respect in the workplace – our values

#### Priorities

- Promoting the health, safety by continuing trainings and improvement measures
- Promoting employee engagement and development (ONE TEAM) by executing continuing trainings
- Conducting at least biyearly employee engagement surveys as basis for the development of corrective actions where applicable

## Governance

### Respecting all legal requirements and internal standards

#### Approach

We are committed to assure acting according to legal requirements and our internal standards throughout our organisation.

#### Priorities

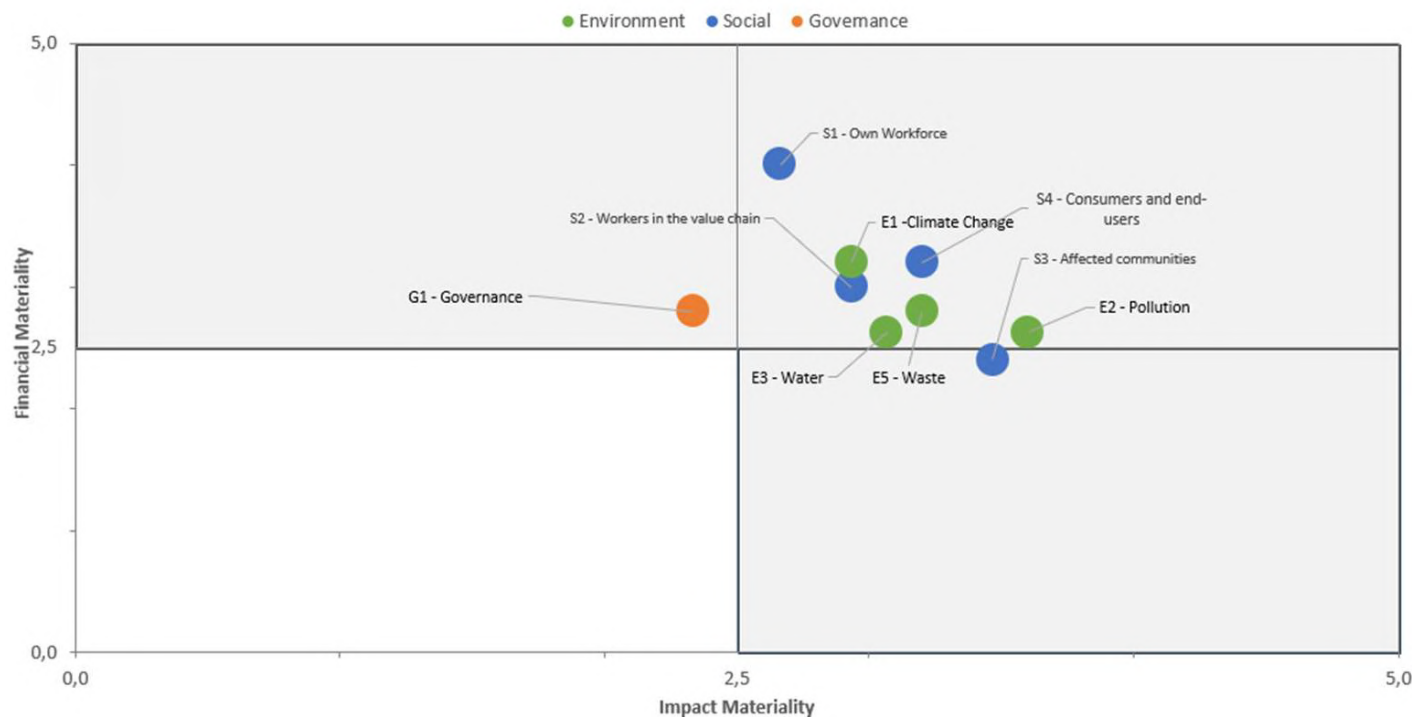
- Promoting and ensuring responsible business conduct
- Carefully selecting and monitoring our business partners
- Promoting open dialogue with our stakeholders
- Applying and further developing our risk management system

## Results of the double materiality analysis (DMA)

We have identified our impacts on the environment and society (materiality of impacts) and the sustainability-related risks and opportunities to which we are exposed (financial materiality). The result is aggregated according to the European Sustainable Reporting Standards (ESRS) topics and shows that E1, E2, E3, E5, S1, S2, S3, S4 and G1 are our material sustainability topics. The environmental impacts and risks in areas E1, E2, E3 and E5 are closely related to our strategic efforts to provide sustainability solutions for our customers.

The following pages provide a detailed illustration of where our material impacts, risks and opportunities arise along our entire value chain.

### Double Materiality Matrix



We have a structured process for implementing the DMA, starting with an assessment of the materiality of the impacts and followed by the financial materiality.

- Involving relevant stakeholders
- Identifying significant impacts, risks and opportunities (IRO)
- Evaluating the significant materiality aspects:

Both positive and negative impacts were assessed.

Impacts were identified as actual or potential. Most impacts were assessed as actual.

Sustainability-related risks and opportunities were assessed.

Impacts and risks were assessed for our own operations and for the value chain, where relevant and possible.

- Review by stakeholders and management
- Control of the main IROs

(OA) Own activity  
 (UVC) Upstream value chain  
 (DVC) Downstream value chain  
 (IRO) Impacts, risks and opportunities

# Environment

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# Environment

## E1 – Climate change

### Climate change adaption

<b>Positive Effect (OA)</b>	Reduction of CO <sub>2</sub> – Emission	We have been implementing CO2 reduction measures over many years such as successively changing our company carpool to electrical car. We will install loading stations at our site in Altleiningen at the beginning of 2025. More important are our projects to install photovoltaic installations. In Italy we plan completion of our photovoltaic project at the end of 2026 whereby in Poland we are evaluating the project development phase. In Altleiningen we ceased evaluating photovoltaic due to ending production at the plant. Additionally, it is planned to purchase green energy from energy suppliers from 2026 onwards. We also reduce our CO2 emission by continuously investing in innovative process technologies with the respective equipment. We especially continue our efforts to replace the need for gas with electricity from renewable sources. We also cooperate with our suppliers in developing CO2 saving material alternatives.
<b>Risk (OA)</b>	Damages caused by extreme weather events	An increasing number of extreme weather incidents results in different risks and following potential high damages and cost which we attempt to adapt for. This includes amongst other: <ul style="list-style-type: none"> <li>– Damages to building (e.g. flooding, hail, heat)</li> <li>– Damages to equipment (e.g. flooding, heat)</li> <li>– Interruption of the supply chain because of such incidents</li> <li>– Breakdown of infrastructure (energy supply, gas supply, roadblocks)</li> </ul>
<b>Risk (UVC)</b>	Climate danger along the supply chain	Changes in climate can negatively influence national and international logistic connections and supply chains resulting e.g. in supply shortages. Extreme weather like flooding, heat, storms might damage production equipment thus leading to production interruptions at important suppliers. Together with our suppliers we attempt to monitor and adapt accordingly.
<b>Opport. (OA)</b>	Cost advantages and improvement of CO <sub>2</sub> – emission	With targeted measures to adapt to climate change several chances are arising: <ul style="list-style-type: none"> <li>- Enlargement regional business partnerships to reduce transport cost and dependency on international supply chain</li> <li>- Reducing the dependency on gas increases resilience of Dradura concerning cost and supply restrictions</li> <li>- Enlarging the use of electrical energy produced by own photovoltaic installation leads to high resilience and long-term cost advantages</li> </ul>

## Environment

### Climate change mitigation

<b>Positive Impact (OA)</b>	CO2 – neutral energy supply and energy efficiency measures	We have started projects to realize photovoltaic plants. In Altleiningen respective plans have been stopped due to the closure of production. A respective installation at our site in San Dona di Piave is planned to be built until end of 2026. A project in Poland is still in the planning phase due to the necessary clarification of local legal restrictions. With the installation of new galvanic lines, we already significantly reduced our energy consumption and further investments are planned to gain a higher energy efficiency. This includes also investments in equipment using electricity instead of gas and by this allowing us to further reduce our CO2 emissions. As some of our processes – for a foreseeable period – cannot be switched from gas to electricity we continue to look for possible future solutions such as those based on green hydrogen. We are stepwise changing the pool of company cars to electrical cars which remains a challenge especially in Poland and Italy as loading stations infrastructure is still limited. We already installed energy efficient and cost reducing technologies like sensor-based lighting, switch to LED lighting and installation of wind curtains reducing the loss of heat through big gates and loading and unloading truck docks.
<b>Negative Impact (UVC)</b>	CO2 – Emissions Procurement and Logistics	Producing our products from raw materials, especially steel, plastic parts and polyamide causes significant CO2-emissions (about 70% of our overall CO2 emissions). Additionally, our products are delivered throughout Europe, North America and partially Asia causing CO2 emissions along our supply chain.
<b>Risk (OA)</b>	Higher prices for greenhouse emissions & Energy	Increasing prices for CO2 and energy cause higher cost (emission trading, emission tariffs for imported products). Increasing regulation, bureaucracy, reporting might cause higher cost, delay of project realizations, restrictions concerning the use of specific technologies etc. These topics might lead to a reduced competitiveness.
<b>Chance (OA)</b>	Increasing demand for products with less emissions	During the transformation phase to a climate neutral society demand for more and more emission reduction and finally emission free product is increasing. Satisfying this demand by applying respective production technologies and use of raw materials create the chance to acquire new market shares and to create competitive advantages.

# Environment

## Energy

<b>Positive Impact (OA)</b>	Long term security of energy supply	With the implementation of photovoltaic panels in 2026, we will become more independent from energy suppliers and additionally reduce our CO2 footprint. We also aim to replace gas in our processes to further minimize our exposure concerning gas supply insecurities and reduce our CO2 footprint. These measures will contribute to a more stable and cost-efficient energy supply.
<b>Negative Impact (UVC)</b>	CO2 – Emissions Procurement and Logistics	Unfortunately, a major portion of planned generated solar power will be “wasted” as local energy suppliers cannot use the „overproduction“ generated during daytime. As soon as efficient and payable storage possibilities are available this energy can be used for our production processes and infrastructure.
<b>Risk (OA)</b>	Higher prices for greenhouse emissions & Energy	Our future energy production plans will not be sufficient to make DRADURA independent from external energy suppliers. This exposes us to external effects and hinders the further reduction of our environmental impact. Parallel new regulative or legal rules might be implemented which slows down our transformation or/and leads to higher costs for the necessary and planned measures.
<b>Chance (OA)</b>	Increasing demand for products with less emissions	Our planned or implemented measures will lead to a significant reduction of CO2-emissions and a CO2-neutral energy supply. These measures have a positive effect on our image and respectively the trust of business partners, financing partners and employees in our reliability concerning environment, social and governance responsibility.

# Environment

## E2 – Environmental pollution

Air pollution		
<b>Negative Impact (OA)</b>	Coating Lines	Operation of our coating lines, especially electro plating lines generates exhaust fumes which although filtered have a negative impact on the environment. Complex filter and recapturing measures in line with regulatory requirements assure this environmental burden is within regulatory limits. Permanent control systems are installed. By investing in new galvanic processes using Chrome (III) instead of Chrome (VI) the Chrome (VI) related health risks are addressed.
<b>Opportunity (OA)</b>	Leading Technology	Having realized an industrialized Chrome (III) production process positions DRADURA as one of the leading companies in the electro plating business, thus generating additional business opportunities. This investment in leading technology is an opportunity for the company to position itself as a best practices leader.
Soil pollution		
<b>Negative Impact (OA)</b>	Pollution with Chemicals, Oils, Lubricants, Dust	Chemicals, oil, lubricants and dust used or resulting from our production processes could cause soil pollution. Though this is prevented by respective handling measures, filters and organizational measures so that the negative impact on the environment is manageable.

## E3 – Water

Water		
<b>Negative Impact (OA)</b>	Water Consumption	The electroplating processes at DRADURA have a significant environmental impact due to high water consumption and wastewater generation. Rising disposal costs and the use of large water volumes (approx. 220,000 m <sup>3</sup> /year) highlight the need for more sustainable water management which we are reviewing.



# Environment

## E5 – Resource use and circular economy

Waste		
Negative Impact (OA)	Waste Volume	At DRADURA, various types of waste are generated throughout our production processes, including steel scrap, paper, cardboard, wood, PE foils, metal dust, and oil-contaminated materials – all of which can negatively impact the environment. We actively implement measures to reduce waste, such as recapturing polyamide powder and improving process quality, with a strong focus on lowering the inherent scrap ratio. In 2024, our total waste volume was approximately 2,800 tons which we intend to reduce by 10%. One-third of our waste is steel scrap. We ensure strict waste separation, achieving a 98.6% sorting rate, and all waste disposal is managed by certified specialists. Our waste management system is comprehensively documented and certified according to ISO 14001.
Positive Impact (OA)	Recycling waste	Unfortunately, a major portion of planned generated solar power will be “wasted” as local energy suppliers cannot use the „over-production“ generated during daytime. As soon as efficient and payable storage possibilities are available this energy can be used for our production processes and infrastructure.
Opportunity (OA)	Increased Use of Recycled Steel (Retrofit & Repair)	For DRADURA, the potential to retrofit or repair products represents a strategic opportunity to promote circular economy practices and extend product lifecycles. While no formal schemes currently exist, the technical feasibility is given. Overcoming economic and technical challenges – as well as encouraging a shift in customer mindset – could open new business models focused on sustainability and long-term value. This could differentiate DRADURA as an innovative, environmentally conscious partner, even if such solutions may initially involve higher product costs.

# Social

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# Social

## S1 – Own workforce

### Secure employment

<b>Positive Impact (OA)</b>	Permanent Employment Contracts	We offer permanent employment contracts to our employees, which bring positive effects such as economic security and a stable income. We will continue to apply this model in the future.
<b>Risk (OA)</b>	Location related challenges (Costs)	Operating in high-cost regions exposes DRADURA to structural disadvantages, such as elevated personnel expenses and cost of living, which reduces international competitiveness. These factors hinder the recruitment and retention of skilled employees and may lead customers and investors to shift orders and investments to more cost-efficient countries. This could weaken DRADURA's regional presence and innovation capacity. Mitigating actions include reviewing the location strategy, investing in automation, and strengthening employer branding.

### Work time

<b>Positive Impact (OA)</b>	Electronic Time Tracking, Mobile and Flexible Work	We are committed to the principles of social responsibility and advocate for fair working conditions. With our timetracking system, we ensure that legal requirements are met and overtime is compensated. We aim to offer maximum flexibility in working hours and locations. This promotes the work-life balance, leading to increased satisfaction and enhanced productivity of our employees. In annual discussions between managers and employees, we regularly address the work-life balance and seek individual solutions.
<b>Opportunity (OA)</b>	Flexible working time models	Implementing flexible working time models offers DRADURA the opportunity to increase employee satisfaction and support a better work-life balance. This can lead to higher motivation, improved retention of skilled workers, and a stronger employer brand, making the company more attractive in a competitive labor market.

### Gender equality and equal pay for equal work

<b>Positive Impact (OA)</b>	Equal pay and the reconciliation of work and private life	We are committed to gender equality by ensuring fair and transparent recruitment and promotion processes. We cultivate a corporate culture that promotes diversity, respect and trust. Our ONE TEAM principle supported by continuing trainings in collaboration, feedback and leadership assure respecting our Group core values: cooperation, respect, fairness, trust. Dradura pays the same wage or salary for the same work. Respective KPIs were first introduced in 2024. Where disparities are found, respective counter measures are implemented.
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# Social

## S1 – Own workforce

### Health protection and safety

<b>Positive Impact (OA)</b>	Occupational health and safety	The safety at the workplace and the safety of our products are fundamental principles for us. Processes, facilities, and equipment must comply with applicable legal and internal requirements for occupational safety as well as health, fire, and environmental protection. All employees are expected to adhere to the relevant safety regulations, be aware of hazards, and think proactively in all safety-related activities. We are certified according to ISO 9001. We regularly train our employees in all areas related to safe workplace practices, health-promoting measures.
<b>Risk (OA)</b>	Workplace absence due to illness and accidents	Workplace absences due to illness and occupational accidents can lead to financial losses, reduced productivity, increased stress for remaining employees, potential quality issues, and possibly higher insurance premiums, as well as legal consequences. Our target is zero accidents and zero work-related sick leave. DRADURA established a scheme of return-to-work interviews to allow identification of workplace improvements reducing the risk of illness and accidents.

### Training and skills development

<b>Positive Impact (OA)</b>	Training and skills development	Our training and professional development programs enable our employees to continuously expand their skills and offer them individual development opportunities (specialist trainings as well as individual development agreements). These measures contribute to the professional and personal development of our employees, increase their motivation and satisfaction, and enhance their performance. We are in close contact with our employees and regularly seek their feedback.
<b>Risk (OA)</b>	Shortage of skilled labor and the age pyramid	The age pyramid and demographic change pose a twofold risk: on the one hand, there are fewer young professionals available in the market, and on the other hand, older employees are leaving the company, which means that valuable know-how and knowledge is lost. This increases the general risk of a shortage of skilled workers.



# Social

## S2 – Workforce in the value chain

Working time		
Positive Impact (UVC)	Sourcing from countries with high labor standards (EU)	Since we source most of our goods from EU countries, our suppliers’ employees benefit from the high labor standards in these countries. We select our suppliers and service providers fairly and without bias and expect the highest quality and best service at competitive conditions. We require our relevant suppliers to respect and comply with the values of our Supplier Code of Conduct and to work within their capabilities to ensure that the values of the Code of Conduct are also respected and complied with throughout the entire supply chain by their suppliers and service providers. A violation can lead to the termination of the business relationship. We conduct regular supplier audits to assure compliance with our Code of Conduct.
Risk (UVC)	Dependency on the availability and qualifications of labor in the value chain	We depend on the availability and qualifications of workers throughout the entire value chain. For example, staff shortages or insufficient qualifications of employees at suppliers could lead to bottlenecks in the supply chain, posing a risk to our own merchandise. In addition, unqualified employees in our company can select defective products or insufficient information can lead to incorrect orders. This risk is further exacerbated by the increasing trend of companies in many industries moving to countries with comparably lower standards and less strict regulations and controls.

# Social

## S3 – Affected communities

Security related impacts		
<b>Positive Impact (OA)</b>	Strengthening the region	We have a positive impact on the regions in which we operate our sites. Through local investments, the creation of jobs and the associated municipal taxes, we contribute to the economic strengthening and development of the region.
<b>Negative Impact (OA)</b>	Impacts on residents	Our production locations may have a variety of impacts on the local environment. These include noise pollution and increased traffic, which can particularly affect residents or people in the immediate vicinity. That our locations are generally in industrial or mixed-use areas we aim to reduce the negative impacts on the local environment and communities where possible.

## S4 – Consumers and end users

Customer Satisfaction		
<b>Opportunity (OA)</b>	Customer satisfaction through high product and service quality	Our business model does not include direct contact or selling to consumers and end users. Still our direct customers sell our products unchanged, i.e. mostly without any further manufacturing to consumers/end users. By continuously improving the products and services we offer (e.g. safety, usability, availability, etc.), we are also able to further increase consumer and end user satisfaction. This leads to a high satisfaction of our direct customers which are then more likely to do more business with Dradura especially when new product platforms are developed and implemented. We monitor our complaints and currently record a rate of less than 0.2% complaints on all deliveries, which further underlines the high quality of our products and services. We intend to introduce an end-user policy into our code of conduct in 2025.

# Governance

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# Governance

## G1 – Corporate Governance

### Company culture

<b>Positive Impact (OA)</b>	Strong Values	At DRADURA, we have firmly anchored values, a strong code of conduct, and our “ONE TEAM principle,” which serve as guiding principles for our employees and foster respectful interactions within our company. The ONE TEAM principle” contains clear rules that ensure a respectful work environment, providing orientation for all team members. In the future, we will be expanding the “ONE TEAM principle” to include essential sustainability aspects, further aligning our values with the evolving needs of society and the environment. Our positive corporate culture is deeply embedded in the company and is actively lived out through various initiatives. These include our flat hierarchies, where every employee is encouraged to contribute ideas and have a voice. We also emphasize respectful and familiar interactions and team events. Regular open communication, such as shop floor meetings, also plays a crucial role in maintaining a transparent and inclusive atmosphere.
<b>Opportunity (OA)</b>	Advantages of being a medium-sized company	As a medium-sized company, we have the opportunity to pursue long-term corporate goals and build stable, trusting relationships with customers, suppliers, employees and banks. Our independence allows us to react flexibly to market changes and to create a clear, responsible background for our products and services. These characteristics offer us the chance to clearly position ourselves in the market and set ourselves apart from the competition.

### Protection for Whistleblowers

<b>Opportunity (OA)</b>	Early detection of problems	We have a whistleblower system that ensures our employees, customers, suppliers, business partners can report violations of laws or initial problems within the DRADURA Group or our supply chain. The purpose of the system is to promote transparency and openness with regard to possible violations or serious irregularities. We use a digital solution for this.
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## Governance

Management of relations with suppliers (including payment practices)		
<b>Positive Impact (OA)</b>	Responsible and fair treatment of suppliers	We maintain fair and responsible relationships with our suppliers. We place great value on clear communication and adherence to timely payments, transparent supplier evaluation and effective risk management. We are continuously working to improve supplier management, including the optimization of payment practices. These practices strengthen our relationships with our suppliers and contribute to a sustainable and trusting collaboration.
<b>Risk (OA)</b>	Migration or insolvency of long-term suppliers	We secure a transparent and clear communication with our suppliers. Understanding our suppliers as business partners essential for our long-term success we closely monitor financial stability, quality, delivery performance and project management especially in case of equipment purchases. These practices too strengthen relationships with our suppliers and secure a long lasting and trusting cooperation.
<b>Risk (DVC)</b>	Increasing pressure from larger suppliers	Another risk is that larger suppliers exert pressure on our company. This can take various forms, such as price increases, tighter contractual conditions or longer delivery times. Such measures could reduce our trade margins, impair our planning security and weaken our competitiveness.
<b>Opportunity (OA)</b>	Long-term supplier relationships	Long-term relationships with our suppliers offer us numerous advantages, such as increased security of supply, improved planning security, favorable framework agreements and stable pricing. In addition, they open up the opportunity to develop new business models and development opportunities together with our suppliers.



# Key figures

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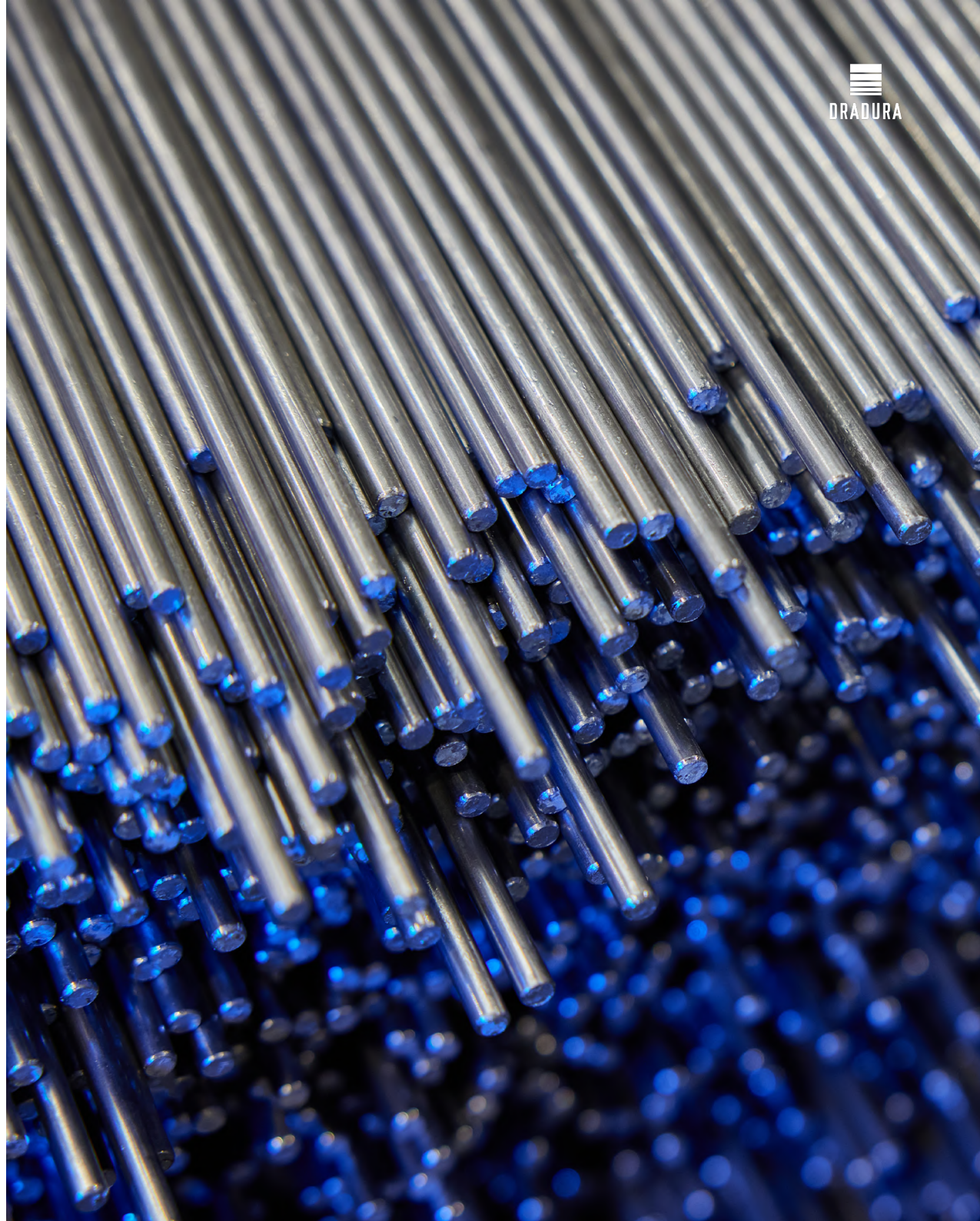


## Environment – Indicators

### Environmental protection

**A**t DRADURA, environmental protection is a central pillar of our sustainability strategy and an essential part of our corporate identity. Our vision is to be a leading provider of durable and sustainable components and assemblies for consumer products across the globe. With our specialization in wire solutions for household appliances, bath and furniture accessories, and various industrial applications, we play a key role in promoting environmentally friendly production practices in Europe and North America.

Our approach is built on the belief that longterm business success must go hand in hand with ecological responsibility. We continuously invest in the development and implementation of innovative, resourceefficient technologies and manufacturing processes. Our aim is to reduce emissions, conserve raw materials, and minimize waste, all while maintaining the highest standards of product quality and operational excellence. Moreover, we understand that our customers and business partners increasingly demand more sustainable products. In response, we are dedicated to meeting these expectations and continuing to develop eco-friendly solutions.



## Environment – Indicators

### CO<sub>2</sub> Balance and reduction targets

As part of our commitment to sustainability, we have pledged to continuously minimize our environmental impact and set ambitious targets for reducing our CO<sub>2</sub> emissions. Our carbon footprint is aligned with the guidelines of the Greenhouse Gas Protocol (GHG Protocol) and includes emissions in Scope 1, Scope 2 and Scope 3.

In 2024, our emissions amounted to:

**Scope 1:** 67.058 tCO<sub>2</sub>e

**Scope 2:** 10.165 tCO<sub>2</sub>e

**Scope 3\*:** 172.034 tCO<sub>2</sub>e

In the base year 2023, we set a strategic target: by the end of 2030, we aim to reduce total Scope 1, Scope 2, and Scope 3 emissions by 30%. In 2024 we realized a reduction of our emissions which was mainly driven by a significant reduction of production volumes compared to the prior year.

Tangible measures to reduce CO<sub>2</sub> have been prepared in 2023 and are executed in the following years, for example:

- New galvanic lines Q4 2024

- Loading stations for electrical cars Q1 2025
- Photovoltaic Q4 2026

Where possible our employees travel via train instead of car or plane.

Given that Scope 3 emissions represent the majority of our overall carbon footprint, achieving this goal requires a comprehensive and collaborative approach that involves not only internal process improvements but also engagement with suppliers, customers, and partners. Key levers for reaching our target include:

- Increasing energy efficiency across all sites and production lines.
- Expanding the use of renewable energy sources and low-carbon technologies.
- Integrating sustainable materials and circular design principles into our products.
- Enhancing supplier engagement to improve upstream transparency and emissions performance.
- Promoting product longevity and recyclability to reduce downstream impacts.

Data points	Unit	Plan midterm	2024	2023
<b>Disclosures E1: Climate Change</b>				
<b>Emissions</b>				
Total GHG Emissions	tCO <sub>2</sub> e	- 30%	249,257	261,682
of which Scope 1	tCO <sub>2</sub> e	- 30%	67,058	71,338
of which Scope 2	tCO <sub>2</sub> e	- 30%	10,165	10,677
of which Scope 3	tCO <sub>2</sub> e	- 30%	172,034	179,667

**\*Scope 3:** At Dradura, we recognize the importance of comprehensive monitoring of emissions from all activities and entities across our value chain. In line with our sustainability strategy, we are therefore progressively expanding our emissions monitoring to include Scope 3 emissions, depending on the feasibility of data aggregation and availability. We anticipate that Scope 3 may account for up to 90% of our total emissions. This means that direct emissions from our own sources (Scope 1) and indirect emissions from purchased energy (Scope 2) are relatively minor compared to the indirect emissions associated with our supply chain, product lifecycle, and end-use of materials. It is important to emphasize that to date for Scope 3 covers only some of the 15 categories with need for further data.



## Environment – Indicators

### CO<sub>2</sub> Foot Print Strategy

As part of our emissions reduction strategy, key levers for decarbonization have been identified. These include:

#### CO<sub>2</sub> emissions reduction:

Our goal is to reduce the CO<sub>2</sub> emissions from our own operations and energy consumption by 50% by 2030, based on the baseline year 2023. This includes optimizing processes, improving facility efficiency, and reducing fossil fuel dependence.

#### Expansion of Renewable Energy Use:

We are increasing the share of renewable energy in our energy mix by investing in solar power and other green energy sources. Our goal is to transition to green electricity at all DRADURA locations and to increase the proportion of production processes that operate exclusively on electricity.

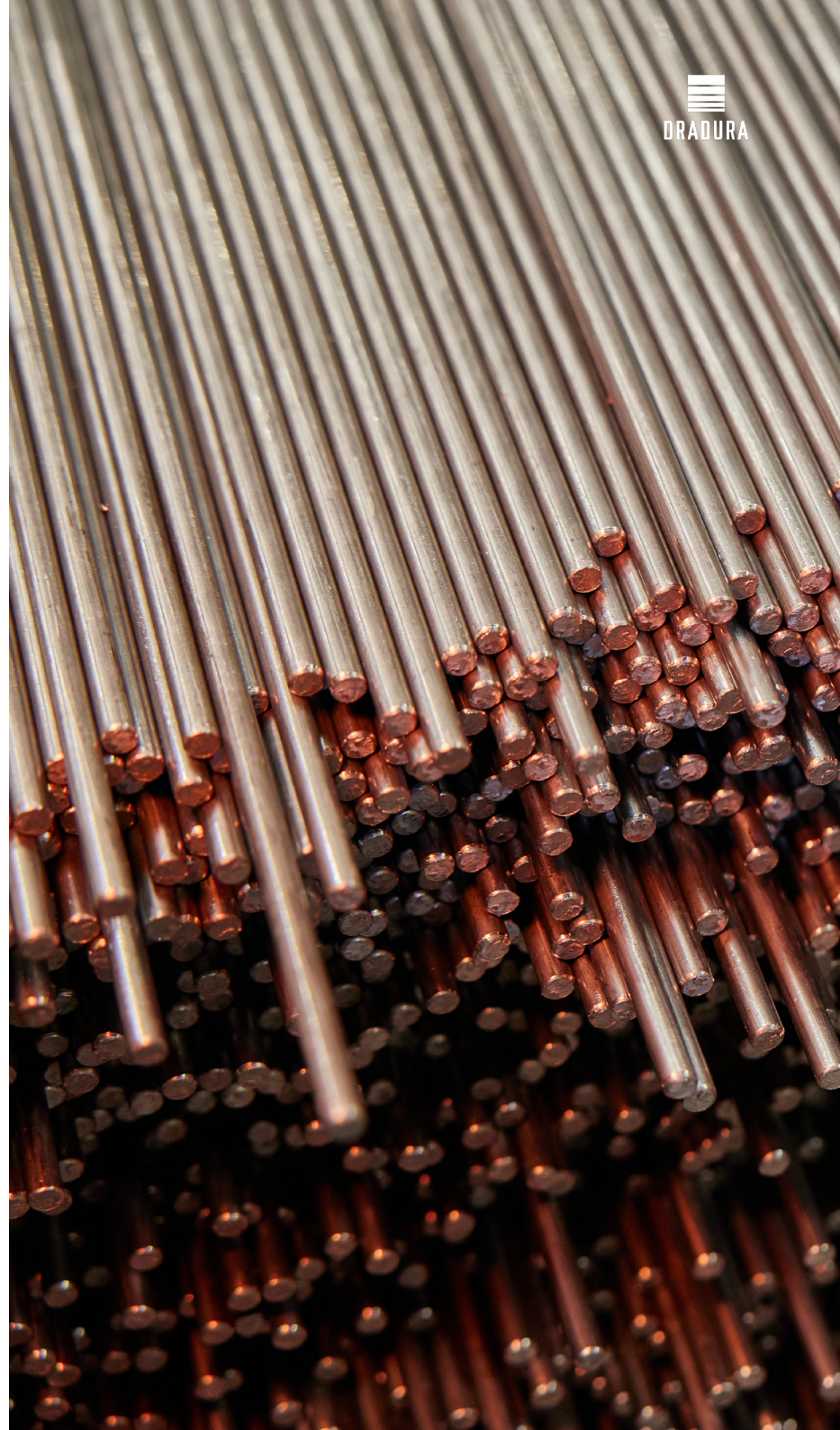
#### Energy Efficiency at All Sites:

We are improving energy efficiency across our global operations through process

optimization, the use of modern, energy-saving technologies, and data-driven monitoring of consumption and savings potentials. These include:

#### Sustainable Supply Chain & Scope 3 Reduction:

We are working closely with suppliers and their subcontractors to enforce a binding code of conduct that ensures compliance with the highest environmental and social standards. Our target is to reduce Scope 3 emissions by at least 15% by 2030 (base year 2023).



## Environment – Indicators

### Energy Consumption and Climate Protection at Dradura Group

With operations across multiple locations, DRADURA Group is fully aware of its responsibility towards climate and resource protection. The energy-intensive processes within our production and logistics facilities — such as material handling systems, water treatment, drying systems, lighting, and heating systems – contribute to our annual consumption, which is estimated 46,881 Megawatt hours (MWh) in 2024.

Looking at specific locations, DRADURA Italia San Donà di Piave and DRADURA Italia Conzano locations together account for 19,581 MWh which is the highest energy consumption within the group. DRADURA Polska requires 15,250 MWh. Both show relatively stable energy consumption patterns in 2024.

DRADURA USA with about 7,264 MWh and DRADURA Altleiningen/Group sites with approximately 4,800 MWh both show relatively stable energy consumption patterns in 2024. Due to the closure of production in both locations the energy consumption will be reduced to minor (office related) volu-

mes in 2025. Still our aim is to cover 50% the electricity need from renewable energy resources.

As part of our commitment to sustainability, DRADURA is focused on increasing energy efficiency at all of its locations. This is all part of aim to reach our CO2 emissions reduction target of 50% by 2030.

We are particularly focused on reducing our carbon footprint through the increased use of renewable energy sources, such as solar and wind energy. These efforts are integral to our broader sustainability strategy, which seeks to minimize the environmental impact of our operations while supporting economic growth and development.

Data points	Unit	Plan midterm	2024	2023
<b>Disclosures E1: Climate Change</b>				
Total energy consumption	MWh	100%	46,881	47,958
of which from fossil sources	MWh	50%	31,437	33,489
of which from renewable sources	MWh	50%	15,444	14,469
<b>Total energy consumption Gas</b>				
Gas	MWh	–	31,435	33,488



## Environment – Indicators

### Water

DRADURA is committed to reducing water consumption across all production processes by implementing advanced water-saving technologies. We recycle a substantial portion of process water and continuously optimize cleaning and rinsing systems to minimize waste. Our goal is to conserve water as a critical resource while maintaining the highest quality standards in manufacturing. Replacing our Chrome (VI) lines with modern Chrome (III) lines has been a major step to reduce environmental impact of our production.

Data points	Unit	Plan midterm	2024	2023
<b>Disclosures E3: Water</b>				
<b>Water use</b>				
Water consumption	m <sup>3</sup>	-10%	78,284	62,859
Water withdrawal	m <sup>3</sup>	-	232,794	189,138
Water discharge	m <sup>3</sup>	-	154,510	126,279

### Circular economy – waste

We carefully separate our waste and have it processed and where possible recycled by local disposal companies. For the delivery of our products, we rely on environmentally friendly reusable boxes/carts. Where this is not possible, we reuse used boxes or use packaging made from recycled materials, which are reused whenever possible. Involving our customers we are examining the use of climateneutral stretch film or recycled packaging materials to further reduce our packaging waste and especially to eliminate plastic materials. Our goal is to take a leading position in the market through a sustainable product and service offering and strengthen our competitiveness.

Data points	Unit	Plan midterm	2024	2023
<b>Disclosures E5: Circular economy</b>				
<b>Waste disposal</b>				
Total amount of waste	t	- 10%	2,799	2,442
Total amount of hazardous waste	t	-	2,602	2,055
Total amount of non-hazardous waste	t	-	196	382

## Social – Indicators

### Secure Employment and Social Protection

We place great importance on fostering a positive corporate culture that promotes respect, sustainability, and a team-like atmosphere. This is reflected in our ONE TEAM principle.

As a medium-sized company, we are able to pursue long-term goals and build stable relationships with our stakeholders and shareholders, ensuring flexibility and independence.

### Labor Policies

Our labour policies being part of our Code of Conduct as well as our ONE TEAM principle ensure that all employees work under safe and fair conditions. We promote equal opportunities and personal development. Our policies include measures for health promotion, workplace safety, and the protection of employees' rights. Through regular training and development, we support our employees in further developing their skills and ensuring they feel comfortable in their working environment.

### Code of Conduct

Our Code of Conduct represents the fundamental values and principles that guide our daily actions. It serves as a framework to ensure ethical behaviour and integrity in all business areas. Our code promotes respectful interaction, equal treatment, and open communication. We expect all employees to adhere to the rules of this code and contribute to creating a positive and productive working environment.

### Code of Conduct for Suppliers

We are committed to social responsibility and expect the same from our business partners (particularly within our supply chain). Our Supplier Code of Conduct sets clear requirements for ethical behaviour, environmental protection, and social standards.

## Social – Indicators

Data points	Unit	2024	2023
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### Disclosures S1: Own workforce

#### Employees

Number of employees (as of December 31)	#	816	895
Of whom women	#	367	365
Of whom men	#	449	529

#### Employment contracts

Proportion of employees with permanent contracts	%	72%	82%
Of whom women	%	46%	42%
Of whom men	%	54%	58%

Data points	Unit	2024	2023
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### Disclosures S1: Own workforce

#### Family and career

Total number of employees entitled to parental leave	#	653	569
Of whom women	%	53%	58%
Of whom men	%	47%	42%
Total number of employees who took parental leave	#	20	20



The reduction of proportion of employees with permanent contracts is caused by the production closure in USA and the respective retention agreements with a higher number of employees supporting the final ramp down until June 2025.

## Social – Indicators

### Occupational safety

In 2024, DRADURA experienced a notable increase in workplace safety incidents compared to the previous year. The Lost Time Injury Rate (LTIR) rose sharply from 5 to 26. This escalation was accompanied by a rise in lost workdays, which grew from 258 in 2023 to 465 in 2024, indicating a higher severity and frequency of workplace accidents. Additionally, the absenteeism rate due to illness showed a slight increase, from 6% to 7%. In response, DRADURA intensified and continues to intensive efforts to enhance risk management, expand safety training, and strengthen its health and safety culture across all sites. This became especially necessary as the closure of production in Germany and USA and the respective headcount reduction of about 230 employees may have lead to additional demotivation and safety negligence on our shop floors. We have also accelerated investments in additional safety installations like light bars, fences etc. Occupational safety has the highest priority in respect of our employees and we strive to achieve the highest standards and best practices available in order to achieve excellence in this area.

Data points	Unit	2024	2023
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#### Disclosure S1: Own Workforce

##### Occupational safety

Lost Time Injury Rate (LTIR = workplace accidents resulting in missed days of work per one million hours worked)	Rate /1 million	15,2	9,9
Lost workdays (LWD)	#	465	258
Absenteeism rate (illness)	%	7	6

### Equal treatment and opportunities for all (training)

DRADURA continues to promote equal treatment and opportunities through comprehensive training initiatives aimed at empowering all employees. In 2024, the company delivered a total of 6,204 training hours—an increase from 5,211 hours in 2023—demonstrating its ongoing commitment to workforce development. Although the average number of training hours per employee slightly declined from 26 to 22, the data shows a significant increase in targeted training efforts for both female and male employees. Female employees received an average of 37 hours of training in 2024, up from 34 in 2023, while male employees received 38 hours, also up from 34. This reflects DRADURA's dedication to offering equitable development opportunities across all employee groups, supporting skill enhancement and career growth in a balanced and inclusive manner.

Data points	Unit	2024	2023
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#### Disclosure S1: Own Workforce

##### Equal treatment and opportunities for all (training)

Number of training hours delivered	#	6,204	5,211
Average number of Training hours per employee per year	#	22	26
Average number of training hours per female employee per year	#	37	34
Average number of training hours per male employee per year	#	38	34

## Governance – Indicators

### Anti-Corruption Policy

Integrity and transparency are our core values. Our Anti-Corruption Policy ensures that all business practices are conducted fairly and in compliance with the law. Bribery, acceptance of benefits, and any form of corruption are strictly prohibited. We expect our employees and business partners to adhere to this policy and promote ethical behaviour in all business interactions.

To date, there have been no incidents of corruption at DRADURA. To ensure that this remains the case, we have established a whistleblowing system through which employees can report violations and provide recommendations.

### Supplier relationship management

We maintain fair, responsible, and sustainable relationships with our suppliers, with a strong emphasis on human rights, labour conditions, and environmental standards. Key elements of our approach include transparent communication, timely payments, and regular supplier evaluations. We continuously improve our internal processes – particularly in payment practices and risk management – to foster trust and ensure long-term stability.

Most of our raw materials are purchased from big international groups, which by themselves have implemented comprehensive Code of Conducts accepted by us as stipulating our required minimum standards. From the many other smaller suppliers only 7% have currently signed our Supplier Code of Conduct and we are actively working toward increasing this share to 25% by 2030. We expect our suppliers to uphold high labour standards, including fair wages and safe working conditions.

Data points	Unit	Plan 2030 Medium Term	2024	2023
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#### Disclosure G1: Corporate Governance

##### Ethics, corruption and bribery

Whistleblower Hotline covering Group	-	Yes	Yes	Yes
Number of convictions for violating anti-corruption and bribery laws	#	0	0	0
Number of reported incidents	#	0	0	0

Data points	Unit	Plan 2030 Medium Term	2024	2023
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#### Disclosure G1: Corporate Governance

##### Supplier relationship management

Total Suppliers	#	-	1,471	1,463
of which signed Code of Conduct	%	20%	4%	1%
% of total purchased volume	%	90%	75%	50%



# Governance – Indicators

## Guideline / Certificates

DRADURA is set to introduce a new End-User Policy (in our Code of Conduct) as part of its ongoing commitment to responsible business practices and sustainable development. This upcoming policy will serve as a guiding framework for how DRADURA's products are to be used and handled by end users, aligning with the company's values of integrity, safety, and environmental responsibility.

Data points	Plan 2030	2024	2023
Guidelines / Certification			
Code of conduct	Yes	Yes	Yes
Supplier code of conduct	Yes	Yes	Yes
Labor policies (Code of Conduct)	Yes	Yes	Yes
Human rights policy (Code of Conduct)	Yes	Yes	Yes
Anti-corruption guideline (Code of Conduct)	Yes	Yes	Yes
End-user policy (Code of Conduct)	Yes	Yes	Yes
ISO 14001	Yes	Yes	Yes
ISO 9001	Yes	Yes	Yes





# Summary

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# Summary

## Environment

**Reduction of CO2-footprint and sustainable production processes as well as raw materials**

At DRADURA Group, we place great importance on environmental protection recognizing that as a supplier of industrially bent, sturdy, and high-quality wire products, we have a direct impact on the environment. Through the use of eco-friendly technologies and the promotion of sustainable practices, we aim to reduce our carbon footprint and contribute to the conservation of natural resources. Concrete steps toward sustainability include use of natural basic materials for coating, use of recycled raw materials, transitioning to electric and hybrid vehicles, utilizing renewable energy, and digitalizing processes. Furthermore, we are encouraging our suppliers to offer environmentally friendly products, and providing our customers with sustainable alternatives to meet their needs efficiently and economically.

## Social

**Fostering safety, equality, dialogue and competence development**

At DRADURA Group, we are committed to fostering a positive and safe working environment for our employees, supported by comprehensive social protection, transparent hiring and promotion processes, and regular training opportunities. Our code of conduct emphasizes the importance of respect, diversity, and equal opportunities in the workplace. These values form the foundation of an inclusive corporate culture, where all employees have equal opportunities for growth and development. We believe in the power of One Team, working together to achieve common goals. We prioritize fairness and quality when selecting our suppliers and service providers, holding them accountable to the values outlined in our code of conduct. These values must be respected throughout the entire supply chain. In cases of non-compliance, we reserve the right to terminate business relationships. Internally, as well as within the broader society, we actively promote equality and integration, ensuring that everyone is treated with respect and given equal opportunities.

## Governance

**Securing compliance with laws and any authority regulation as well as our internally stipulated values and principles**

At DRADURA Group we ensure compliance with ethical and legal business practices through various policies, including our anti-corruption policy, which prohibits any form of corruption. Our whistleblowing system also provides a way for individuals to report violations. Constant trainings are executed to assure awareness of all employees of required processes, possible risks and required counter measures e.g. concerning cyber security/data protection. Our certified risk management system assures a consequent and detailed assessment of compliance. Additionally, our CSR code of conduct requires our partners to uphold the same high standards concerning environmental protection, human rights, and working conditions. This commitment ensures that ethical practices are maintained throughout our business operations and partnerships.

## Disclaimer

This Sustainability Report includes forward-looking statements based on our current estimates and assumptions. These statements encompass projections, targets, expectations, and plans related to our sustainability initiatives. However, they are subject to risks and uncertainties that could result in actual outcomes differing significantly from those anticipated. Factors that may cause such differences include, but are not limited to, changes in legal and regulatory conditions, technological advancements and innovations, market and economic fluctuations, availability and cost of resources and materials, and shifts in climate and ecological conditions.

We are committed to providing accurate and timely information on an ongoing basis, but we do not assume any obligation to update or revise the forward-looking statements contained in this report, unless required by law. The data and information contained in this report are prepared to the best of our knowledge and belief, but we do not guarantee the accuracy, completeness or timeliness of the information. This report is for information purposes only and does not constitute legal, financial or other advice.



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