

ENVIRONMENTAL POLICY

voestalpine AG

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1 PREAMBLE

voestalpine is a steel and technology group operating globally across its business segments, combining expertise in materials and processing, and focused on product and system solutions made of steel and other metals in technology-intensive industries and niche sectors with the highest quality standards.

The voestalpine Group is aware of its comprehensive economic, environmental, and social responsibilities. This Environmental Policy is linked to the Group's sustainability strategy, which establishes sustainability as an integral part of the Group's strategy. It is specified in the individual division, business unit, and functional strategies and translated into practical measures.

voestalpine strives to continuously improve its environmental performance.

In doing so, emphasis is placed on implementing measures where they have a corresponding impact on improving environmental performance.

This policy defines voestalpine's principles and requirements in the area of the environment and focuses on aspects where the voestalpine Group's business activities interact with the environment. It is intended to support Group companies in identifying and implementing local environmental strategies and environmental goals, as well as in continuously improving environmental performance.

The voestalpine companies commit to complying with the applicable legal environmental regulations and internal Group policies in all business activities and decisions, while taking into account the protection of local environmental conditions.

2 CLIMATE PROTECTION AND ADAPTATION TO CLIMATE CHANGE

Climate change is one of the greatest challenges of our time and requires decisive action from companies. As one of Austria's largest greenhouse gas emitters, voestalpine faces the task of reducing its emissions. The focus is on transforming production processes through technological innovations, strategic investments, and close collaboration with customers and suppliers.

This is supported by extensive research and development of new technologies, often through cross-sector collaborations and projects. An open dialogue with stakeholders, including policymakers and environmental organizations, is also part of the strategy.

voestalpine is committed to climate protection, aims for net-zero CO₂ emissions by 2050 in accordance with the requirements of EU legislation, and has developed a Group-wide climate transition plan (hereinafter "Climate Transition Plan") that includes targets for reducing greenhouse gas emissions in Scope 1, 2, and 3.

All Group companies commit to supporting voestalpine's targets set out in the Climate Transition Plan and actively contributing to their achievement: They align their local environmental targets and environmental management systems with the Group-wide Climate Transition Plan, implement site-specific measures (e.g., energy efficiency, material cycles, and supplier engagement with verified product carbon footprints),

collect and report emissions data in accordance with Group standards, and work closely with customers and suppliers to achieve reductions along the value chain.

The voestalpine Group regularly prepares a corporate carbon footprint, for which Group companies are obligated to provide data.

In the interest of transparency, voestalpine discloses data on greenhouse gas emissions, water consumption, and other environmental emissions as part of reporting requirements and data platforms. The voestalpine Group also participates in cross-industry initiatives.

3 ENERGY AND ENERGY EFFICIENCY

Energy and energy efficiency are key issues for voestalpine, as the company, being energy-intensive, views sustainable energy management as an essential component of its corporate strategy. Optimizing energy consumption and promoting renewable energy are crucial for global climate protection and the company's long-term competitiveness.

The implementation of energy management systems in accordance with ISO 50001 or an equivalent standard at voestalpine sites with significant energy consumption ensures systematic optimization of energy use, thereby improving both resource utilization and long-term profitability.

Locations with significant energy consumption regularly evaluate the feasibility, use, and implementation of an energy management system in accordance with ISO 50001 or an equivalent standard.

4 PREVENTION OF ENVIRONMENTAL POLLUTION (AIR, WATER, SOIL)

Active environmental protection, particularly the prevention and reduction of environmental pollution, has been firmly anchored in voestalpine's corporate principles for decades. To effectively manage the negative impacts associated with environmental pollution, voestalpine relies on locally implemented environmental strategies. A key tool for this is environmental management systems in accordance with the recognized standards EMAS, ISO 14001, or equivalent.

These enable the effective, rapid, and site-specific implementation of measures and goals. Further information on this is provided in Chapter 10.

Preventing and reducing negative impacts on air, water, and soil quality is one of the core tasks of the environmental management systems at voestalpine's production companies.

Activities, measures, and goals to improve environmental performance are identified, planned, and implemented at the company level. These may also be published in environmental statements, among other places.

Air:

One tool in the area of air emissions, for example, is comprehensive pollutant monitoring that either meets or exceeds regulatory requirements. This enables process managers to intervene early in process control when required. The facilities for preventing and reducing negative environmental impacts meet or exceed national requirements in all cases.

Water:

Water is an indispensable resource for voestalpine's production processes. It is primarily used for cooling purposes in pig iron and steel production, in melting processes, and in heat treatment. Against the backdrop of increasing climatic and regulatory requirements, sustainable, structured, and systematic water management activities are of crucial importance, both for minimizing impacts and for ensuring long-term production capacity.

As part of the environmental management systems, companies where necessary have local water management plans that are developed, continuously monitored, and further refined within the companies. Other key components of water management activities within the environmental management systems include the use of separate water cycles and comprehensive water treatment.

Soil:

voestalpine and its subsidiaries strive to identify, secure, and remediate contaminated sites at their locations. This includes the collection and treatment of leachate, the capping of contaminated sites, and the conduct of extensive inspections in accordance with legal requirements. Successful containment or remediation measures have already been carried out at various sites, which have been approved by the authorities and classified as successful. The goal is to secure the contaminated sites so that there is no longer any danger to the environment and the affected areas can be made usable again.

5 STATE OF THE ART

voestalpine operates its facilities in accordance with national regulations based on the economically feasible state-of-the-art techniques (BAT, Best Available Technique), which is often regulated in the form of specific requirements (such as in the EU for large-scale facilities in accordance with the BAT documents under the Industrial Emissions Directive). While the implementation of such modern technologies and processes that meet current environmental standards cannot completely eliminate emissions, it does allow for their continuous reduction. Regular review and updating of the technical facilities and processes in the Group companies ensure that legal requirements are met or even further improved.

When evaluating potential measures, the relevant departments also consult external experts from regulatory agencies, plant designers, and technology suppliers, as well as the company's own research departments.

6 CIRCULAR ECONOMY AND WASTE

voestalpine is an integral part of the circular economy within the economic system and adheres to the model of circular economy principles (10R). In this context, the circular economy is considered at various levels, encompassing both processes and products across different stages of the value chain and processing depths, as well as their respective business models.

At voestalpine, the circular economy is not limited to the chemical element iron. Material flows and energy should be reused productively time and again to continue generating value. The focus is on the (re)recovery of value components and energy content for use in our own processes and products, and on expanding cycles to avoid and minimize waste, taking into account technical feasibility, economic feasibility, economic benefits, and legal compliance.

Circular products and business models support the sustainable development of voestalpine and its value chains.

Through targeted research and development, voestalpine continuously expands the potential of the circular economy, links this to its efforts to reduce greenhouse gas emissions, and continuously advances the various aspects of circularity at all levels.

At voestalpine, the circular economy contributes to enabling sustainable, value-adding growth and to ensuring future viability, resilience, and competitiveness.

The companies of the voestalpine Group actively support the area of circular economy and resource conservation as part of the Group's sustainability strategy and, by implementing corresponding measures in their business units, make a significant contribution to achieving the strategic direction.

7 BIODIVERSITY AND ECOSYSTEMS

The voestalpine companies take into account aspects related to the protection of local environmental conditions, including biodiversity and ecosystems, and compliance with environmental regulations within the framework of site-level environmental management systems. In addition, targeted measures and action plans (such as those for establishing sustainable supply chains) help to effectively manage key sustainability aspects and to avoid, reduce, or mitigate actual and potential impacts.

8 RESPONSIBLE SUPPLY CHAIN (CONFLICT MINERALS, CRITICAL RAW MATERIALS)

voestalpine sources a wide variety of materials, products, and services from numerous suppliers worldwide. It supplies its products—mostly semi-finished goods—to companies in various industries and countries. The analysis and management of indirect impacts along the value chain currently focus primarily on the upstream sector, specifically the supply chain.

The procurement principles are aligned with the Group Strategy 2030+ and the Sustainability Strategy. In doing so, voestalpine aims to minimize (potential) negative impacts in the value chain and associated risks for the company, and to ensure ethical and environmental standards along the supply chain.

voestalpine rejects the use of conflict minerals from conflict-affected areas.

The companies of voestalpine adhere to and comply with the international and national guidelines and requirements regarding conflict minerals that apply to them.

We equally require and demand that resulting obligations and the corresponding transparency be met throughout our supply chain. Documentation regarding the management of conflict minerals is maintained within the respective companies.

9 CHEMICALS

The use, marketing, and handling of chemicals, substances of concern, and substances of very high concern are subject to legal frameworks. The companies of the voestalpine Group must ensure compliance with the associated obligations. voestalpine companies use hazardous substances only when no alternatives are available and under strictly controlled conditions. This ensures that the use of chemicals is minimized and environmental impact is reduced. Key aspects of chemical management include the management of hazardous substances, information and documentation tasks, and the use and application of safety information such as Material Safety Data Sheets (MSDS). These measures help to ensure the health of employees and the protection of the environment to the greatest extent possible. Chemical management and documentation and verification for hazardous substances are carried out at the corporate level.

10 MANAGEMENT SYSTEMS (E.G., ENVIRONMENT, ENERGY)

To effectively manage the negative impacts associated with environmental pollution, voestalpine relies on locally implemented environmental strategies. To this end, environmental management systems (EMS) have been implemented at production sites with significant emissions in accordance with the recognized standards EMAS, ISO 14001, or equivalent. The environmental management systems define how the respective Group companies can improve their environmental performance, fulfill legal and other obligations, and achieve local environmental goals.

In addition, voestalpine continuously evaluates the necessity and feasibility of introducing environmental management systems in the various companies. A key consideration here is whether a company has significant environmental impacts from a Group perspective or can make a significant contribution to the improvement of the Group's environmental performance. Implementation must take place within a reasonable timeframe.

When expanding or modifying business operations—for example, through the acquisition of a relevant production site—the existence of an environmental management system, as well as the necessity and appropriateness of its implementation, are evaluated. A fundamental aspect of this assessment is whether a company has a significant environmental impact from the Group's perspective or can make a significant contribution to improving the Group's environmental performance.

11 PREVENTION OF NOISE, ODORS, AND RADIATION

voestalpine avoids environmental impacts such as noise or odor to the best of its technical capabilities and monitors radiation protection at its sites.

When planning new facilities, emphasis is placed on low-noise equipment and appropriate noise control measures. Various measures are taken to minimize noise pollution from existing facilities. These include, for example, the installation of noise barriers or facades, the installation of silencers, and organizational

measures to reduce noise. These measures aim to reduce noise pollution for nearby residents and the environment.

voestalpine takes measures to ensure the safety of employees and the environment from radiation to the greatest extent possible. For example, in crude steel production, raw materials are tested for radioactivity upon delivery, and radioactivity measurements are also conducted during production processes to minimize risks.

12 LIFE CYCLE ASSESSMENT AND PRODUCT SUSTAINABILITY

A key focus for voestalpine in determining the sustainability of products is on ecological aspects, particularly the analysis of environmental impacts and their decarbonization. A central element and methodological tool in this regard is life cycle assessment (LCA). This requires uniform, robust, and globally comparable methods that can create an international level playing field and promote sustainable economic growth.

voestalpine supports a holistic and integrated approach to the assessment of materials as well as all process and value chains within the framework of the circular economy.

Companies within the voestalpine Group support sustainability assessments at the product level and thus the preparation of Life Cycle Assessments (LCAs), and prepare life cycle inventories, product carbon footprints, and environmental footprints for key products and product groups in accordance with relevant standards and frameworks. To publish this information, the companies use various forms of declarations, including Environmental Product Declarations (EPDs), depending on the respective requirements.

13 ENVIRONMENTAL ASPECTS IN THE EVENT OF CHANGES TO BUSINESS OPERATIONS (LOCATION, BUSINESS MODELS)

voestalpine strives to continuously improve its environmental performance. All principles of this policy also apply in the event of changes to a company's business activities.

In the event of changes or expansions to business operations, e.g., through acquisitions, new business ventures, or changes to the business model, environmental aspects and impacts are evaluated. Furthermore, compliance with laws, legal regulations, and internal and external standards and regulations is reviewed.

Direct and indirect impacts of business activities on the environmental aspects addressed in this policy are identified within the framework of the Group's sustainability organization. The results and findings are incorporated into internal decision-making processes and form part of internal and external reporting.

voestalpine maintains regular communication with its stakeholders and conducts this dialogue in a responsible, solution-oriented, and transparent manner.

As a global steel and technology group, voestalpine is aware of its comprehensive responsibilities and ensures compliance with all environmental, social, and economic requirements when making changes to its business operations, such as acquisitions, including:

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- » Compliance with all relevant legal regulations
- » Protection of the environment and ecosystems, as well as people and health
- » Respect for human rights and the rights of vulnerable populations
- » Preservation and protection of cultural heritage

