



# SUSTAINABILITY REPORT 2024

## CEO Letter



**Dear readers,**

I took over the leadership of VTU from Friedrich Fröschl in 2025. Even though the developments described in this report took place before my time at VTU, it is a personal priority for me to introduce this sustainability report as the new CEO. Sustainability is not an issue that stops at changes in leadership – on the contrary: sustainability is an integral part of our corporate strategy and a unifying element across all times and people. I would like to send a clear signal: VTU continues to stand for responsible action. The new management will continue and further develop this path with conviction.

The world is undergoing profound change – ecologically, economically and socially. As a company, we bear responsibility for how we respond to these changes and what contribution we make to a future worth living. With this report, we want to present our efforts for a sustainable future transparently and make them accessible to all our stakeholders.

We recognize that our business activities have an impact on the environment, the economy and people (both positive and negative) and we see it as our duty to eliminate or reduce as far as possible any negative effects that we cause or contribute to in order to bring about the necessary change. To this end, we are focusing on specific measures such as increasing efficiency and reducing emissions. The validation of our 2024 science-based targets by the SBTi is an important milestone

here. The task now is to achieve the climate reduction targets we have set (more on this in chapter '6 Environment - Climate Change'). In the long term, we will drive forward the integration of sustainability criteria in all business areas.

Our strategic priorities are based on international frameworks such as the UN Global Compact, which we have been a member of since 2023. Constantly changing legal regulations, geopolitical uncertainties and social change challenge us and at the same time motivate us to continuously develop our sustainability strategy.

We made some progress in the reporting year: In preparation for the CSRD (Corporate Sustainability Reporting Directive), we have largely aligned our reporting with the ESRS (European Sustainability Reporting Standards); we increased the percentage of women in management positions to 27% (see chapter '7 Social - Own Workforce'), and continued to convert our company car fleet to electric vehicles.

At the same time, challenges remain – especially in difficult economic times such as these. Adapting to ever-changing reporting obligations, winning projects and integrating sustainability into all business processes are complex tasks that we are tackling with determination. Nevertheless, we consider our employees to be our greatest asset and strive to offer them a good workplace and an open corporate culture.

With this report, we would like to give you an honest and comprehensive insight into the development status of our internal sustainability processes. We invite you to join us on the path of 'Transformation to Sustainability' – critically, constructively and together.



**Liam O'Neil**

CEO of VTU Group

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# 1 Basis of Reporting and Methodology

VTU Group, a European engineering service provider, publishes its sustainability report on a consolidated basis, aligned with its financial reporting scope. The report covers the full calendar year 2024 and includes all subsidiaries, with data centrally collected and processed using consistent methodologies. The parent company holds 100% ownership of all subsidiaries, ensuring uniformity in reporting.

The report encompasses VTU's upstream and downstream value chains where applicable and where data is available. In cases where direct data collection or measurement was not feasible, estimates based on indirect sources, sector averages or recognized secondary data sources were used. The information on these estimates and uncertainties are transparently documented in the respective accounting policies sections.

Methodological improvements, particularly in emissions calculations, may lead to recalculations year over year. Any such changes and their significance are explained in the relevant KPI sections.

The used performance indicators are in reference to the standards defined by the European Sustainability Reporting Standard (ESRS) and the Global Reporting Initiative (GRI). While the 2023 report was based solely on GRI, the 2024 report marks a transition to ESRS, with GRI indicators still referenced for continuity. VTU adheres to the medium- and long-term time horizons defined in ESRS 1.

No exemptions under Article 19a(3) or 29a(3) of Directive 2013/34/EU were applied.

The report was approved by the Executive Management and has not undergone external assurance. VTU has been reporting annually on its sustainability performance since 2020.

## 2 Sustainability Commitment

The larger a company is, the greater its social and environmental responsibility. We live up to this responsibility in our internal processes as well as our planning projects, in which our colleagues' and partners' safety, health and satisfaction take top priority alongside the ecological dimension. The guidelines we hold ourselves to include high standards in relation to both sustainability reporting (GRI, ESRS) and sustainability assessments (EcoVadis, CDP).

The VTU Mission Statement, the [VTU CSR Policy](#) and the [VTU Code of Conduct \(CoC\)](#) serve our employees as an expression of our commitment to securing a sustainable future and as navigation tools for all our decision-making processes. The CSR policy focuses on the fields of human rights, diversity/inclusion, the fight against corruption and the handling of business partnerships, the environment, health and safety, and is considered a 'guidance document'. The Code of Conduct can be considered to be a derived and definitive set of guidelines, and consists of a set of rules and requirements for appropriate managerial conduct and general conduct in day-to-day business, with the focus on covering the following areas:

- Health and safety
- Sustainability
- Legal compliance
- Human rights
- Diversity/inclusion
- Environmental protection
- Protection of the material and intellectual property of VTU
- Prevention of corruption, bribery and money laundering

The ideas and principles that we define for these fields also apply to all our other areas of our activity. They are not only aimed at the employees of VTU, our business partners and subcontractors; we also invite all other stakeholders to join us on the journey to a sustainable future.

With our CoC and our CSR policy, we commit to

- continuously look for ways to reduce our ecological footprint and CO<sub>2</sub> emissions in the interests of protecting the environment
- act in an ethical and socially responsible manner which goes beyond the applicable legal requirements
- consider the relevant requirements and integrate all the stakeholders affected by our actions
- work hard to attain a sustainable development in terms of our relationships with our business partners and colleagues

## 3 Business and Governance

### 3.1 Company Structure

VTU Group is a European engineering and technology service provider specializing in the process industry. Founded in 1990 in Graz, Austria, the company has grown into a consolidated group of specialized entities operating across several European countries. The group functions under a unified governance and reporting structure, with all subsidiaries fully owned by the parent company, VTU Management GmbH. This centralized ownership ensures consistency in strategic direction, operational standards, and sustainability reporting.

Figure 1 shows the company structure of VTU group with its entities, branches and countries.

During the reporting period, there were no acquisitions or disposals of VTU subsidiaries. The office in Langkampfen, that had been an extension of the branch office Kundl, was established as own branch office.

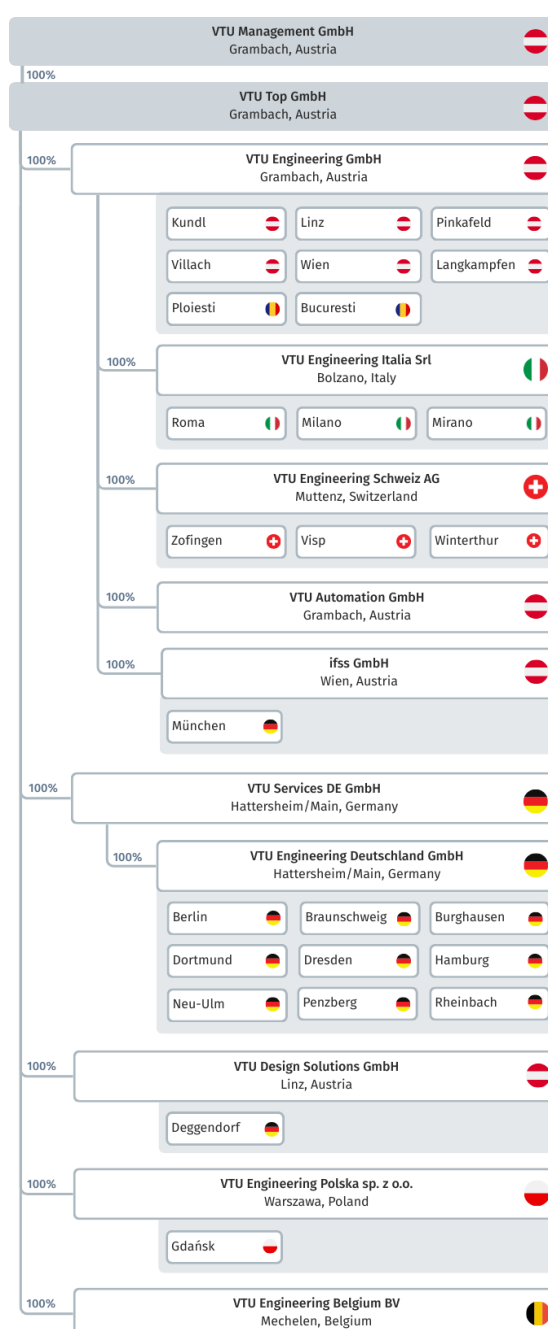


Figure 1: Company structure and branch locations of VTU Group

## 3.2 Fields of Activity

VTU delivers a comprehensive portfolio of engineering services tailored to the needs of the process industry. VTU's core competencies include the design and planning of process plants and production facilities, optimization of existing plants, and the general planning of large-scale industrial investments. The group also offers services in industrial digitalization, project management, and project controlling across all project phases. In addition, VTU provides EPCMv (Engineering, Procurement, Construction Management, and validation) services and specialized consulting, such as safety studies.

For clients in the pharmaceutical sector, VTU offers highly specialized services including qualification and validation in accordance with current Good Manufacturing Practice (cGMP), process development and transfer, regulatory submissions, and support during inspections and audits.

VTUs services are spanning a wide range of industries. These include:

- Biopharma
- Consumer care
- Pharmaceuticals
- Food industry
- Chemicals
- Energy
- Oil and gas
- Electronics
- Plastics
- Metallurgy and minerals
- Medical technology
- Pulp and cellulose

There were no changes in offered services or main markets during the reporting period.

The company does not operate in sectors such as fossil fuel extraction, controversial weapons, or tobacco production, and none of its services are banned in any of its markets.

Through its integrated structure and broad service offering, VTU positions itself as a key partner in the development and implementation of sustainable, high-tech solutions for the European process industry.

## 3.3 Corporate Governance

VTU Group operates under a clearly defined governance framework that ensures strategic alignment, regulatory compliance, and sustainable corporate management. The governance structure is composed of three interrelated bodies: the Shareholder Committee, the Supervisory Board, and the Executive Board.

The appointment and selection of these governing bodies are carried out by VTU's majority owner, Altor. Professional and social qualification criteria are considered, and an increase in diversity is aimed for. VTU currently does not have policies on sustainability-related incentive and remuneration systems for members of the administrative, management and supervisory bodies.

These bodies are supported by a Management Board and specialized roles responsible for sustainability and corporate social responsibility.

### Shareholder Committee

The Shareholder Committee is the highest decision-making authority within VTU. It is responsible for overarching strategic decisions and high-level risk management. The committee also serves as an advisory body to both the Supervisory Board and the Executive Board.

It is composed of one independent member and three representatives of the majority shareholder, Altor, ensuring both external oversight and shareholder alignment.



## Supervisory Board

The Supervisory Board functions as the primary oversight body. It ensures that the Executive Board complies with regulatory requirements, aligns the company's strategic direction with the owner's vision, and manages the company in accordance with sustainability principles. The board meets quarterly and receives detailed reports from the Executive Board.

The board consists of two independent advisors with experience in engineering and production industries, and two representatives of the majority shareholder. There are no employee representatives on the Supervisory Board.

## Executive Board

The Executive Board is responsible for the operational leadership of the VTU Group. It is also tasked with the development, approval, and periodic adjustment of the company's strategy, policies, and vision. It ensures that sustainability is integrated into all business areas and that adequate resources are allocated to support data-driven sustainability management.

The Executive board comprises the Chief Executive Officer (CEO), Chief Financial Officer (CFO), two Executive Directors of Operations, and the Executive Director of Human Relations & Communication.



**Friedrich Fröschl**  
**Chief Executive Officer**

### Experience and competences

With extensive experience in the engineering industry, being one of the company's founders, Friedrich Fröschl drives VTU's commitment to environment and people.



**Matthias Steinbrink**  
**Chief Financial Officer**

### Experience and competences

With extensive experience in financial roles from engineering industries, Matthias Steinbrink ensures financial and sustainability performance and transparency.



**Rudi Wierer**  
**Exc. Dir. Operations**

### Experience and competences

As long serving manager in VTU, Rudi Wierer understands the business in such a way that he is able to foster implementation of sustainability in all operational steps. Next to his role in the Executive Board he serves as managing director of VTU Engineering Italia Srl.

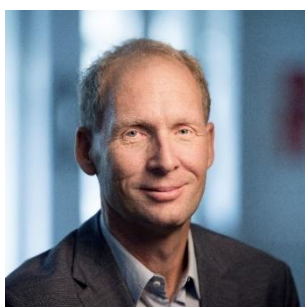


**Thomas Miklautsch**  
**Exc. Dir. Operations**

**Experience and competences**

Also a long serving manager in VTU, Thomas Miklautsch has obtained extensive knowledge on all parts of the business and ensures executional excellence in projects.

Next to his role in the Executive Board he serves as managing director of VTU Engineering GmbH and VTU Design Solutions GmbH.



**Wolfgang Zelle**  
**Exc. Dir. HR & Communications**

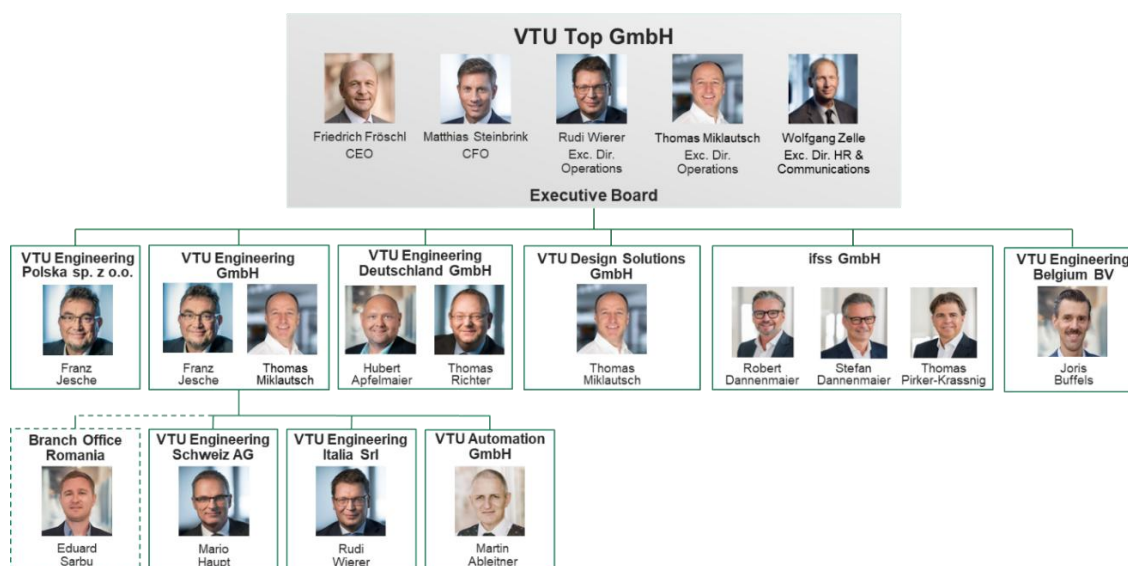
**Experience and competences**

With extensive HR leadership experience from international companies, Wolfgang Zelle supports VTU's sustainability aspirations through a strong people strategy.

The CEO holds overarching responsibility for economic, environmental, and social matters and is accountable for the review and approval of all published sustainability information. As the highest internal executive authority, the CEO reports directly to the Supervisory Board, ensuring a clear separation of oversight and execution.

## Management Board

Supporting the Executive Board is the Management Board, which includes the 11 managing directors of all VTU subsidiaries not represented on the Executive Board.



**Figure 2: Executive and Management Boards of VTU Group**

This body is responsible for translating the group's strategic objectives into operational plans. It develops annual plans for each business area, incorporating economic, societal, and sustainability considerations. The Management Board also plays a key role in the annual strategy process, where progress is assessed and actions are defined if necessary. In case changes in material sustainability matters are effecting the company's strategy the information is taken up in the annual strategy development.

During the reporting period the following material impacts, risks and opportunities have been discussed:

- Transforming employee commuting and business travel to low emission transport options
- Changing VTUs car fleet to low emission vehicles
- Improvement of diversity in leadership positions
- Gender pay gap situation in VTU

### 3.4 CSR Management

Corporate Social Responsibility (CSR) at VTU is embedded within the company's governance and operational framework. The responsibility for Corporate Social Responsibility (CSR) lies with the Executive Board under the leadership of the CEO, which defines the strategic direction and approves the sustainability-related objectives and measures.

The Director of EHS<sup>1</sup> & Sustainability is charged with advising the Executive board on sustainability matters and implementing the defined sustainability strategies and decisions across the organization. This role includes development, coordination, and oversight of sustainability-related processes and initiatives throughout the VTU Group as well as identifying and managing sustainability-related impacts, risks, and opportunities.

The Director of EHS & Sustainability reports directly to the CEO and works in close coordination with the Executive Board. Regular meetings between the CEO and the Director of EHS & Sustainability ensure that current sustainability issues are addressed promptly and that strategic alignment is maintained.

A sustainability manager and senior managers on country and branch level are responsible for implementing the defined measures. This decentralized structure allows for the integration of sustainability into local operations while maintaining group-wide consistency.

#### Processes and Procedures

CSR management at VTU is governed by a set of formalized processes and procedures (e.g. CSR Policy, Code of Conduct) that are reviewed and approved by a member of the Executive Board. These include:

- **Development of Sustainability Procedures**  
All procedures related to the identification, assessment, and management of sustainability impacts, risks, and opportunities are developed by the Director of EHS & Sustainability. These procedures are subject to approval by an Executive Board member to ensure alignment with corporate strategy and compliance requirements.
- **Annual Management Review**  
Sustainability performance as well as impacts, risks and opportunities are reviewed annually as part of the management review process. This includes an evaluation of key performance indicators (KPIs), assessment of target achievement, and identification of corrective actions where necessary. The review also considers the risks and potential consequences of inaction, applying a precautionary approach to environmental and social issues.
- **Compliance and Risk Management**  
VTU maintains structured processes to ensure compliance with legal, ethical, and internal standards. These include defined procedures for risk identification, internal reporting channels, internal audits and regular training for employees. Compliance is integrated into the company's broader risk management system, which supports the early detection and mitigation of potential legal, reputational, and operational risks.
- **Delegation and Implementation**  
Strategic sustainability tasks and projects are delegated to the country and branch levels. This ensures that implementation is adapted to local conditions while remaining aligned with group-wide objectives.

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<sup>1</sup> Environment, Health and Safety

- **Incident Management**

CSR management is closely linked to VTU's broader incident management systems. These systems include mechanisms for identifying and analyzing incidents that may result in personal, environmental, or property damage. Lessons learned are documented and shared across the organization to support continuous improvement.

### 3.5 Integration with Strategic Planning

CSR is not treated as a standalone function but is integrated into VTU's strategic planning and corporate culture. From a strategy point of view objectives are defined during the company's annual strategic planning process and are integrated into both mid-term and short-term planning cycles. Sustainability KPIs are developed in alignment with these objectives and are monitored through the annual review process. The results of this monitoring inform adjustments to strategy and operational planning.

Culture-wise the Executive Board and Management Board actively support sustainability and view themselves as part of a leadership coalition for sustainable development. Employees and managers on all levels are also involved in shaping the company's values – for example, through the co-creation of VTU's mission statement with younger staff members.

By embedding CSR into its governance and operational structures, VTU ensures that sustainability considerations are systematically addressed across all levels of the organization. This approach supports regulatory compliance, risk mitigation, and the long-term resilience of the company, enabling VTU to meet the demands of modern, data-driven sustainability management while fostering a responsible and ethical corporate culture.

### 3.6 Metrics

#### GOV-1 – The role of the administrative, management and supervisory bodies

**Table 1:** Composition of governing bodies

	Shareholder Committee		Supervisory Board		Executive Board	
	#	%	#	%	#	%
Female	1	25.0%	1	25.0%	0	N/A
Male	3	75.0%	3	75.0%	5	100%
Other	0	N/A	0	N/A	0	N/A
Not reported	0	N/A	0	N/A	0	N/A
Total	4		4		5	
Thereof independent members	1	25.0%	2	50%	0	N/A

#### SBM-1 – Strategy, business model and value chain

**Table 2:** Geographic workforce distribution (heads)

Geographical Area	#
Western Europe	1,023
Southern Europe	102
Eastern Europe	55

**Table 3:** Financial KPIs

	mEUR
Net revenue	167.23
Gross profit	127.27
Equity capital (incl. investment subsidies)	159.09
External capital	86.96
Total capital	288.22

## 4 Value Chain and Stakeholder Relationships

### 4.1 Value Chain

VTU's value chain begins and ends with its industrial clients, encompassing all intermediate stages of project development and delivery. It is characterized by a high degree of collaboration with external stakeholders, particularly suppliers and service providers, whose influence – whether financial, safety-related, or societal – is considered essential for effective project execution. These relationships are typically contractual and project-specific.

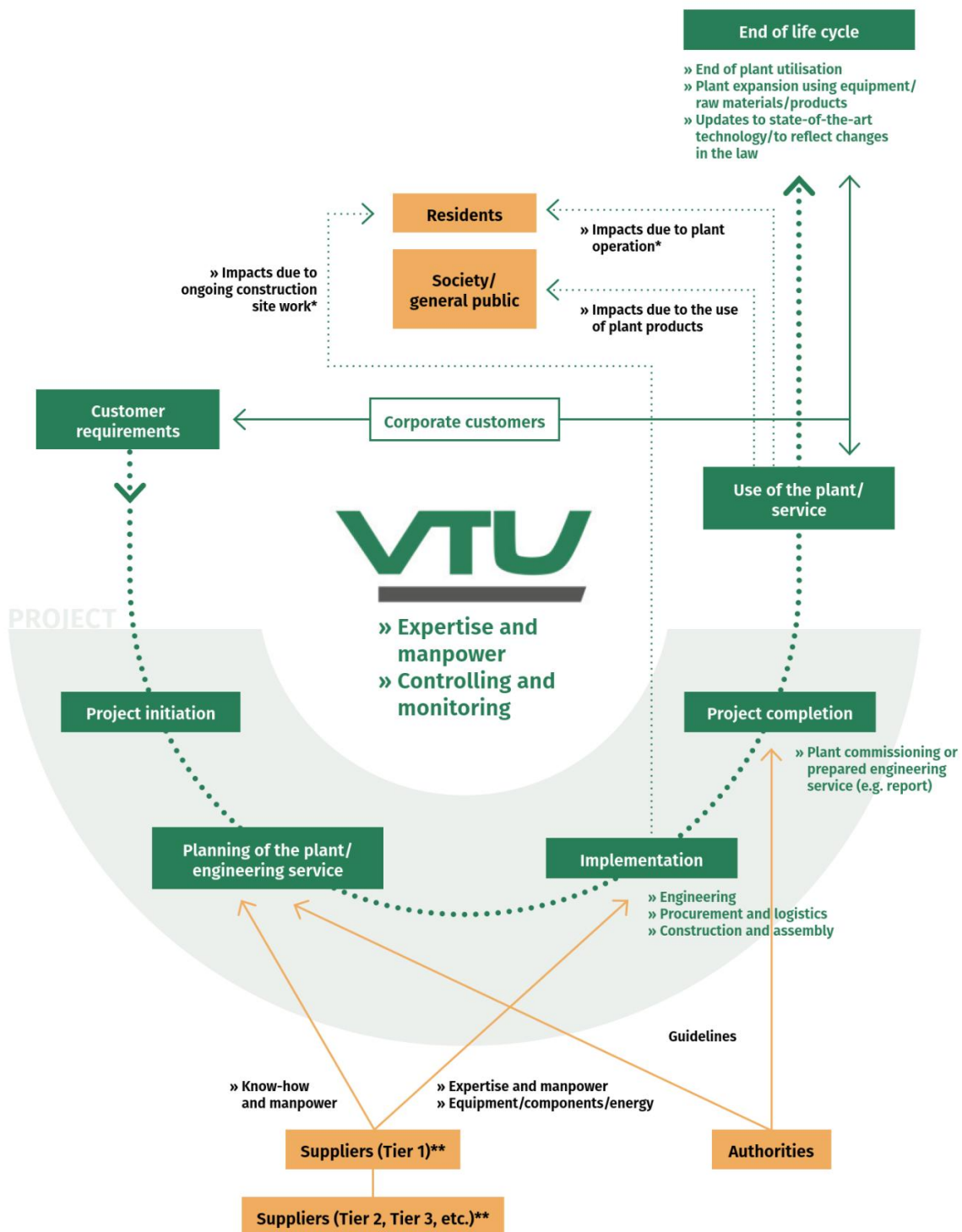


Figure 3: Value chain of VTU



VTU aims to foster long-term partnerships through repeat engagements but does not rely on fixed standard suppliers and has not introduced significant changes to its supply chain structure since 2022.

Understanding its influences enables VTU to integrate preventive measures directly into operational workflows, thereby reducing the likelihood of problems and mitigating potential risks at an early stage.

The outputs generated along the value chain are primarily project deliverables and documentation, produced through the use of digital tools, office supplies, and paper-based materials.

## 4.2 Social and Environmental Impacts in Operations and Supply Chain

VTU's activities, particularly during construction and plant installation phases, can result in localized environmental and social impacts, for which VTU takes responsibility and takes action to remediate them. These include emissions from machinery and vehicles, generation of construction-related waste such as rubble and excavated material, and noise pollution. In such cases, VTU engages in direct communication with affected residents and, where appropriate, implements compensatory measures. For example, if construction work leads to soiling of nearby buildings, compensation may be provided in the form of vouchers for cleaning services.

Beyond its own operations, VTU also considers actual and potential impacts along its supply chain. These may arise from raw material extraction, energy and resource use, transport activities, and emissions associated with construction processes. Key suppliers include energy providers, global material and component suppliers, assembly service providers, and engineering partners. VTU monitors these relationships to identify and mitigate adverse environmental and social effects across the value chain.

VTU has implemented a pre-qualification process for new suppliers that includes environmental and CSR-related criteria since mid-2023. These criteria assess whether suppliers have sustainability targets, calculate their corporate carbon footprint, and evaluate working conditions in their supply chains. While these factors are not currently used as exclusion criteria due to the fact that a majority of companies in the supplier sectors of VTU is just currently starting in their sustainability journey, they serve as decision-making inputs and reflect VTU's commitment to responsible sourcing.

VTU's office activities do not have a direct impact on biodiversity; VTU does, however, have an indirect impact on biodiversity through the activities along our value chain. This impact is seen as not material (see Figure 4).

## 4.3 Stakeholder Engagement at VTU

Stakeholder engagement is a central element of VTU's sustainability and strategic management approach. The company recognizes the importance of understanding the influence of and on stakeholders throughout the value chain – whether financial, safety-related, or societal.

VTU's decisions and operations affect a wide range of individuals and groups, and these stakeholders, in turn, influence VTU's ability to achieve its objectives.

This awareness enables VTU to proactively address potential risks and integrate sustainable solutions into its operations from the outset.

As such, VTU maintains a structured and inclusive process for identifying, engaging, and responding to stakeholder interests and concerns. We employ a variety of communication methods tailored to the specific needs of each stakeholder group. These include:

- Direct interactions, such as personal meetings and email correspondence
- Internal and external surveys
- Regular communication events for employees and customers
- Newsletters and informational brochures
- Online platforms for information sharing and feedback

In 2023, VTU conducted a comprehensive survey to analyze how the different stakeholder groups are communicating with VTU in order to better understand the effectiveness of its communication channels. The results identified direct interactions as the most commonly used and preferred method. This survey will be repeated in 2025 to ensure continued relevance and effectiveness of engagement practices.

## 4.4 Stakeholder Landscape

VTU manages its stakeholders interests via a stakeholder landscape that contains the risks and opportunities associated with them. The key stakeholders identified for VTU are (in alphabetical order):

- Customers
- Employees
- Intra-group service providers
- Management/Executives
- Shareholders
- Subsidiaries
- Supervisory/Advisory board
- Suppliers

These groups represent diverse perspectives and expectations, and VTU acknowledges the importance of understanding and addressing their respective needs.

The stakeholder landscape is reviewed annually by VTU's management. This review includes an assessment of stakeholder interests, potential risks and opportunities associated with stakeholder relationships, and the relevance of stakeholder feedback to strategic planning. The process is led by the CEO in collaboration with the Director of Quality Management, the Director of EHS & Sustainability, and the IT Security Manager.

## 4.5 Integration into Strategy and Decision-Making

The stakeholder landscape assessment forms part of the broader management review process. Insights gained through engagement activities are transported via the assessment results and used to inform the development of the company's strategy and business model. This includes identifying emerging risks and opportunities, shaping sustainability priorities, and guiding operational improvements. New measures as well as information received by the stakeholders over the different communication channels are taken up in the annual strategy planning regarding strategy and business model.

By maintaining an open, ongoing, and goal-oriented dialogue with its stakeholders, VTU fosters mutual understanding and builds trust. This engagement supports the company's commitment to responsible governance, sustainable development, and long-term value creation.



## 5 Material Impacts, Risks and Opportunities

Understanding and managing material impacts, risks and opportunities (IROs) is a central component of VTU's sustainability strategy. The company applies a structured and evolving process to identify, assess, and prioritize sustainability-related topics that are relevant to its operations, stakeholders, and long-term value creation. This process is aligned with the European Sustainability Reporting Standards (ESRS) and supports the integration of sustainability into VTU's strategic and operational planning.

### 5.1 The Double Materiality Assessment (DMA) Process

VTU follows a systematic process to identify, assess, and prioritize sustainability-related impacts, risks, and opportunities. The process consists of the following steps:

- **Understanding**

As first step VTU's sustainability context needs to be understood. This involves identification and engagement of key stakeholders –such as customers, employees and suppliers – to understand their expectations and concerns. Through surveys, discussions, and workshops, VTU gathers valuable insights into which environmental, social, and governance (ESG) topics are most relevant for our stakeholders. This phase also includes an analysis of industry trends, regulatory developments, and peer practices to ensure that VTU's understanding of material issues is both current and comprehensive.

- **Identification**

With a clear understanding of the context, VTU proceeds to identify the specific impacts, risks, and opportunities that are most relevant to its operations and value chain. This includes both actual and potential effects, spanning upstream suppliers to downstream clients. The identification process draws on internal data, external consultations, and cross-functional collaboration to ensure a holistic view. It also considers emerging issues and long-term trends that could influence VTU's business environment and sustainability performance.

- **Assessment**

Once identified, each topic is assessed for its significance. VTU evaluates the likelihood and potential impact of each issue. These assessments include financial risk, regulatory exposure, reputational considerations, and alignment with strategic goals. Importantly, VTU incorporates the principle of double materiality – evaluating not only how sustainability issues affect the company, but also how the company's activities impact the environment and society. This dual perspective ensures a balanced and responsible approach to risk and opportunity management.

- **Prioritization**

The final step involves prioritizing the most material topics to guide strategic decision-making and reporting. VTU convenes cross-departmental teams to validate and rank these issues based on their relevance, urgency, and potential to influence business outcomes. The prioritization process ensuring that decisions are well-founded and aligned with both stakeholder expectations and regulatory requirements. The resulting priorities are then integrated into VTU's sustainability strategy, risk management framework, and corporate reporting, ensuring that the company remains proactive and resilient in a dynamic environment.

This process to conduct a materiality assessment was first executed in 2020 based on the Global Reporting Initiative (GRI) standard. It considered VTU's impacts and the relevance for its stakeholders. The assessment was consecutively updated in 2022 to incorporate stakeholder feedback gathered through structured questionnaires.

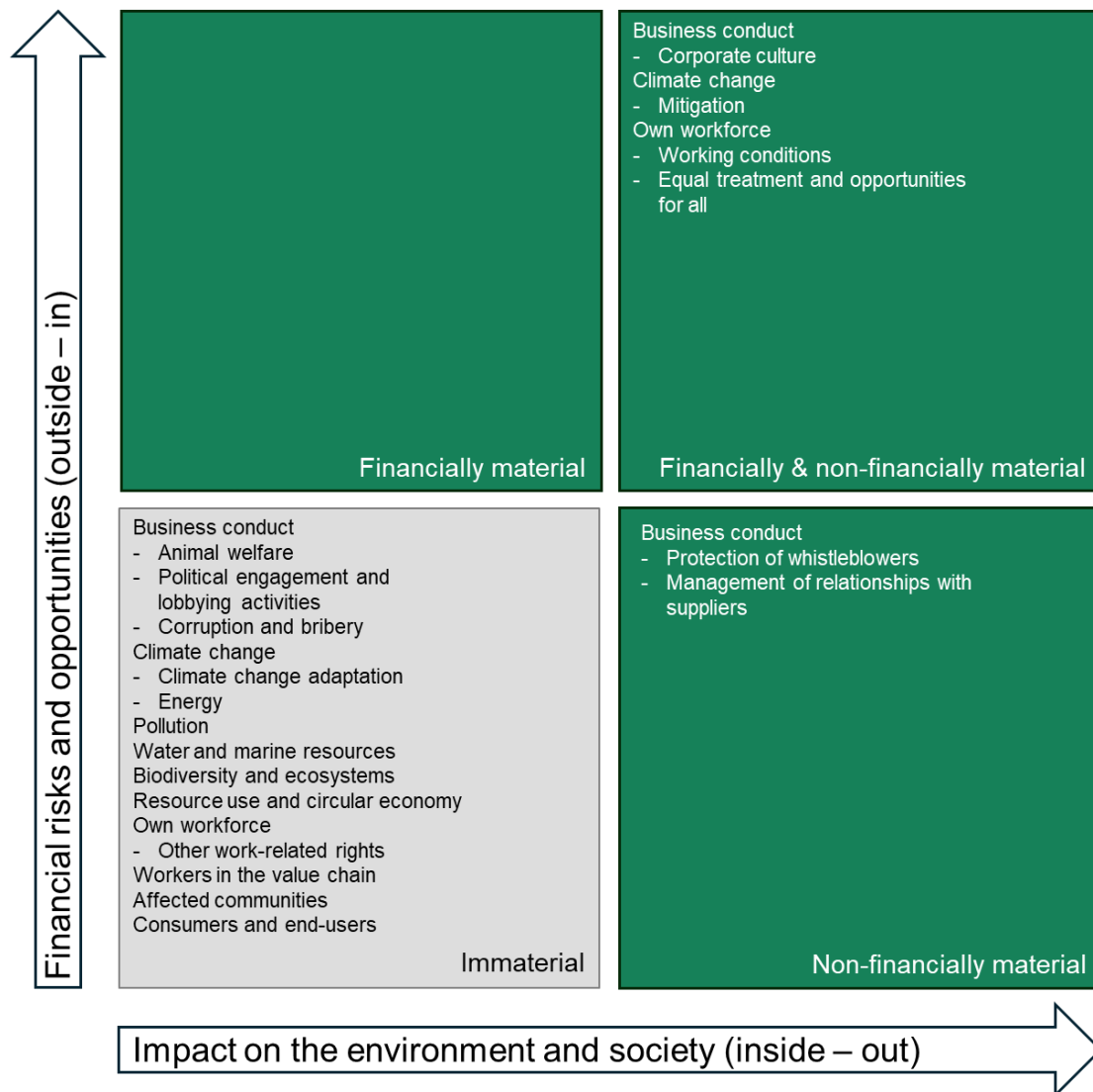
In 2024, the process was comprehensively revised to align with the Corporate Sustainability Reporting Directive (CSRD) and ESRS requirements as well as include the outside-in view, thereby moving towards the double materiality approach. Existing IROs from the 2020 assessment were mapped to the ESRS topic structure. A cross-functional team of internal experts, including members of the Executive Board, EHS & Sustainability, and Human Resources, then reviewed each topic. In addition new topics, especially the newly assessed risks and opportunities, were discussed and addressed. Assessment and

prioritization followed the steps described above. The results were reviewed and validated by the Executive Board and relevant stakeholders.

Due to the change to ESRS the revision in 2024 changed almost all category names in the materiality assessment and matrix. However when looking at the content of these categories the material topics in itself did not change.

The DMA process ensures that VTU's materiality assessment is not static but evolves with regulatory developments, stakeholder expectations, and scientific insights. In 2025, the matrix will be shared with additional external stakeholders to incorporate their perspectives and further strengthen the double materiality approach.

## 5.2 Key Material Topics Identified



**Figure 4:** Double materiality matrix

As a service-oriented company, VTU's core value lies in the expertise and capabilities of its workforce. Accordingly, material impacts, risks, and opportunities related to employee development, retention, and well-being are of central importance. Governance-related topics similarly focus on maintaining a safe, compliant, and stable working environment for the employees.

Failure to address these material topics may impair VTU's ability to deliver services effectively due to constraints in personnel availability, competence, or operational continuity.

Environmental impacts, particularly those associated with emissions from operations and business travel, also represent a key area of attention.

If not addressed these impacts can damage VTUs reputation as an engineering company that can understand the material issues of our customers and support them in building sustainable processes.

E1 – Climate Change			
Subtopic	Description	Classification	Time Horizon
Climate Change Mitigation	VTUs CO <sub>2</sub> emissions are impacting climate change due to emissions generated by business travel, commuting and purchased goods and services.	Actual negative impact	Short-, medium-, long-term
	By managing and reducing VTUs CO <sub>2</sub> emissions specifically in the fields of business travel, commuting and purchased goods and services VTU can support climate change mitigation.	Potential positive impact	Medium-, long-term
	Due to the need of travelling to the customer, increased costs for CO <sub>2</sub> generation in transportation may lead to increased costs that cannot be passed on	Risk	Medium-, long-term

S1 – Own Workforce			
Subtopic	Description	Classification	Time Horizon
Working Conditions			
Secure employment	Stable income and security for livelihood through stable employment and attractive and permanent contracts	Actual positive impact	Short-, medium-, long-term
	VTU is an attractive employer by offering secure employment and stable income for potential employees	Opportunity	medium-, long-term
	VTU is not an attractive employer by offering secure employment and stable income for potential employees	Risk	medium-, long-term
Working time	Positive influence on personal well-being and health as well as quality of work due to working time (including peaks) being balanced out over a reasonable timeframe	Actual positive impact	Short-, medium-, long-term
	Negative influence on personal well-being and health as well as quality of work due to working time being constantly high due to project demands and not being balanced out over a reasonable timeframe	Potential negative impact	Short-, medium-, long-term
	Excessive working time and related stress can lead to negative health effects and consequently to loss of resources due to sick leave or resignation	Risk	Short-, medium-, long-term

Adequate wages	Appropriate remuneration ensuring an adequate standard of living increases satisfaction and motivation of employees	Actual positive impact	Short-, medium-, long-term
Collective bargaining	Positive influence on satisfaction of employees due to standardized salaries and benefits due to collective agreements (minimum standard guarantee)	Actual positive impact	Short-, medium-, long-term
Work-life balance	Good work-life balance for employees through part time and flexible working time models as this contributes to adapt according to the needs of family and free time next to work. This is further supported by the possibility of working remotely part-time where possible.	Actual positive impact	Short-, medium-, long-term
	VTU is not an attractive employer due to lacking work-life balance, leading to inability to cover project execution, especially short term project peaks or very specialized project tasks by own personnel and not being able to grow as a company	Risk	Medium-, long-term
	Insufficient work-life-balance and related mental stress can lead to negative health effects and consequently to loss of resources due to sick leave or resignation	Risk	Short-, medium-, long-term
<b>Equal treatment and opportunities for all</b>			
Training and skills development	Inequality in development of in-house personnel (gender, race, educational background) leads to unequal manning of leadership positions. This prevents (not necessarily active but at least passively) the development of an inclusive and open-minded company culture.	Risk	Medium-, long-term
Gender equality and equal pay for work of equal value	Positive influence on satisfaction of employees and open corporate culture due to elimination of inequalities and discrimination	Potential positive impact	Medium-, long-term
Measures against violence and harassment in the workplace	Positive influence on well-being and security creating a healthy surroundings in which people can thrive	Actual positive impact	Short-, medium-, long-term
	VTU is not an attractive employer due to a toxic work environment, leading to inability to find or retain personnel, thereby not covering necessary resources for project execution and not being able to grow as a company	Risk	Medium-, long-term
Diversity	Diversity in the workforce enables an inclusive and open-minded company culture. This leads to increased motivation in work, a broader spectrum of ideas and problem solving approaches and therefore to a better execution of projects.	Opportunity	Medium-, long-term
	Lack of diversity in the workforce prevents an inclusive and open-minded company culture. This leads to low motivation in work, a narrow spectrum of ideas and problem solving approaches and therefore to a lack in project execution excellence.	Risk	Short-, medium-, long-term

G1 – Business Conduct			
Subtopic	Description	Classification	Time Horizon
Corporate culture	Shared convictions (corporate culture) ensure that decisions and plans can be implemented more quickly and effectively and be seen as beneficial by all stakeholders	Actual positive impact	Short-, medium-, long-term
	A positive, inclusive and open corporate culture attracts and retains good employees to ensure project execution and growth	Opportunity	Short-, medium-, long-term
	Lack of a positive, inclusive and open corporate culture prevents good employees to join VTU and leads to high personnel fluctuation, risking good project execution and growth	Risk	Short-, medium-, long-term
	To keep employees satisfied it may be necessary to continuously expand work environment and increase expenses (benefits, facilities, working hours,...)	Risk	Medium-, long-term
Protection of whistleblowers	A good whistleblowing system and process enables a good whistleblowing culture that will mitigate negative impacts due to e.g. corruption, harassment, as information on these non-compliances are received and can be acted upon by the management	Actual positive impact	Short-, medium-, long-term
Management of relationships with suppliers incl. payment practices	Reliable payment practices ensure that suppliers remain financially stable, thereby reducing the risk of supply chain disruptions	Actual positive impact	Short-, medium-, long-term

### 5.3 Integration into Strategy and Risk Management

The results of the DMA are directly integrated into VTU's sustainability strategy, risk management framework, and corporate reporting. Material topics inform the development of key performance indicators (KPIs), guide resource allocation, and shape the company's mid- and long-term objectives.

By systematically identifying and addressing its most significant impacts and risks, VTU ensures that it remains resilient, responsible, and aligned with stakeholder expectations in a rapidly changing business environment.

## 6 Environment – Climate Change

### 6.1 Material Impacts, Risks and Opportunities

As described in the section 5 the double materiality analysis by VTU showed that climate change is material in terms of impacts, risks and opportunities for VTU.

Impacts	
Climate Change Mitigation	(-/+) VTUs CO <sub>2</sub> emissions are impacting climate change. By managing its emissions specifically in the fields of business travel, commuting and purchased goods and services VTU can affect this impact to a major extent.
Risks/Opportunities	
Climate Change Mitigation	(-) Due to the need of travelling to the customer, increased costs for CO <sub>2</sub> generation in transportation may lead to increased costs that cannot be passed on

### 6.2 Our Approach

VTU's approach to climate change mitigation and adaptation, emissions management, and corporate carbon footprint reporting is grounded in a sustainability strategy that aims to integrate environmental responsibility into all aspects of its operations.

The company recognizes climate change as a critical global challenge and aligns its goals with the Science Based Targets initiative (SBTi) and the Paris Agreement's 1.5°C target. This commitment is embedded in VTU's CSR Policy, Code of Conduct, and Supplier Code of Conduct, which collectively emphasize the reduction of greenhouse gas emissions and the management of climate-related risks.

Climate considerations are not treated in isolation but are embedded across the company's internal operations, client services, and supply chain. VTU calculates its Corporate Carbon Footprint (CCF) annually, covering all three scopes of emissions as defined by the Greenhouse Gas Protocol. This includes direct emissions from company vehicles and facilities (scope 1), indirect emissions from purchased energy (scope 2), and a wide range of value chain emissions (scope 3), such as business travel, commuting, and subcontracted services.

The company's internal governance structure ensures that climate-related goals are integrated into strategic decision-making. The EHS & Sustainability department plays a central role in monitoring progress and coordinating initiatives.

VTU also supports its clients in their own decarbonization efforts through engineering solutions that incorporate energy efficiency, circular economy principles, and innovative technologies such as green hydrogen. This dual focus – reducing its own footprint while enabling clients to do the same – reflects VTU's holistic and proactive stance on climate responsibility.

### 6.3 Actions

#### 6.3.1 Climate Change Mitigation and Adaptation

VTU's climate action strategy is both inward- and outward-facing. Internally, the company calculates its CCF annually and uses this data to guide emission reduction efforts. Through its Green Engineering approach, VTU integrates sustainability into project planning and execution, using different tools and methods.

Internally, VTU has embedded climate responsibility into its operational and strategic processes. The calculated Corporate Carbon Footprint covers all three scopes of emissions as defined by the

Greenhouse Gas Protocol. This comprehensive accounting forms the basis for targeted reduction measures and continuous performance monitoring.

VTU has submitted its climate targets to the Science Based Targets initiative (SBTi), planning to reduce scope 1 and scope 2 emissions for 50.4% and scope 3 emission intensity for 58.1% from the baseline of 2023 till 2032. For 2050 VTU is targeting scope 1 and scope 2 emissions reduction of 90% and scope 3 emission intensity reduction of 97%. These targets have been officially approved by SBTi. This external validation confirms that the company's emissions reduction pathway is aligned with the goal of limiting global warming to 1.5°C, as set out in the Paris Agreement.

VTUs decarbonization strategy includes transitioning the way of travelling (public transport, electrical vehicles), providing low emission work places (low energy buildings, energy efficient equipment, green electricity) and working time models (remote work) as well as promoting behavioral changes (virtual meetings, public transportation), that reduce emissions.

The company is implementing measures to track progress and monitor sub-targets, with results disclosed in annual reports. Energy consumption is already tracked across all locations and energy intensity is monitored relative to both employee count and revenue, providing a basis for identifying efficiency opportunities. No cross-site energy saving and energy efficiency initiatives that can be quantified have yet been implemented.

VTU also considers long-term environmental risks in its infrastructure planning and operational decisions, integrating resilience and adaptability into its internal systems. Future efforts will concentrate on understanding long-term requirements, assessing cost and technical feasibility, and ensuring a cost-effective transition to net-zero.

Externally, VTU plays a proactive role in helping clients reduce their environmental impact. Through its Green Engineering approach, the company is able to integrate sustainability into every phase of project planning and execution. This includes the use of proprietary tools such as the SuSTaIN method and the greenSPEED™ toolbox, which enable clients to identify energy and material savings, quantify environmental and economic impacts, and implement targeted improvements. These tools have been applied across various industries, including pharmaceuticals and chemicals, resulting in measurable reductions in emissions and resource consumption.

VTU also supports the adoption of innovative low-carbon technologies. A notable example is its work in green hydrogen, where the company assists clients in assessing feasibility, navigating permitting processes, and implementing infrastructure for hydrogen production, storage, and distribution. In one project, VTU helped a client replace natural gas with hydrogen in a production facility, achieving significant emissions reductions.

In addition, VTU promotes circular economy principles in its engineering solutions. This includes designing systems that minimize waste, extend the lifecycle of materials, and enhance resource efficiency. Digital tools for energy monitoring and predictive maintenance further enhance clients' ability to respond to environmental risks. The company also incorporates climate adaptation measures into project designs, ensuring that industrial infrastructure is resilient to long-term environmental changes.

### **6.3.2 Corporate Carbon Footprint: Scope 1**

Scope 1 emissions at VTU primarily stem from its vehicle fleet and minor fugitive emissions from air conditioning systems. To address this, VTU has implemented a structured transition to low-emission mobility. As of 2024, 38.5% of the fleet consists of electric vehicles, up from 17.9% in 2022, while the share of gasoline and diesel vehicles has dropped to just over 50%. Hybrid vehicles make up the remainder. The company also tracks total travel distances and promotes virtual collaboration and remote work to reduce travel-related emissions.



### 6.3.3 Corporate Carbon Footprint: Scope 2

Scope 2 emissions result from the purchase of electricity, heating, and cooling for VTU's rented office spaces. Although the company has limited control over building infrastructure, it actively selects green electricity providers and monitors energy consumption.

In 2024, 66.4% of electricity used came from renewable sources, contributing to an overall renewable energy share of 29.5%. VTU also tracks energy intensity per employee and per revenue and promotes the use of energy-efficient equipment and lighting. However, the growing share of electric vehicles has led to increased electricity consumption, which is being addressed through efficiency measures.

### 6.3.4 Corporate Carbon Footprint: Scope 3

Scope 3 emissions are the most significant component of VTU's carbon footprint, with major contributors including employee commuting, business travel, and subcontracted services.

VTU promotes remote work and subsidizes public transport to reduce commuting emissions. Business travel policies support the use of train travel over flights, and digital tools such as smart glasses are used to minimize on-site presence at the customer. The company also evaluates supplier sustainability and includes emissions from subcontracted services in its reporting where data is available.

## 6.4 Metrics and Targets

VTU's climate-related targets are aligned with the SBTi framework and focus on continuous improvement across all emission scopes.

For scope 1, the company aims to further increase the share of electric vehicles and reduce reliance on fossil fuels.

In scope 2, the goal is to raise the proportion of renewable energy used and improve energy efficiency, including through the selection of more sustainable office locations.

Scope 3 targets emphasize reducing travel-related emissions through behavioral change and digitalization, encouraging low-emission commuting, and strengthening supplier engagement on sustainability.

These efforts are regularly reviewed through key performance indicators and stakeholder feedback to ensure alignment with strategic goals and external expectations.

In the following, metrics that show the status of VTU's environmental topics are presented. Details on the calculation and data sources can be found in the section accounting policies.

## E1-4 – Targets related to climate change mitigation and adaptation

**Table 4:** Overall SBTi targets of VTU




KPI		2023	2024		2032 <sup>2</sup>		2050 <sup>3</sup>	
		Base year	Result	Target	Target	%	Target	%
Scope 1 absolute reduction	t CO <sub>2</sub> eq	829.3	783.9	782.9	411.3	49.6%	82.9	10.0%
Scope 2 absolute reduction	t CO <sub>2</sub> eq	584.0	536.7	551.3	289.7	49.6%	58.4	10.0%
Scope 3 intensity reduction	t CO <sub>2</sub> eq/MEur	46.0	41.6	42.9	19.3	41.9%	1.4	3.0%

<sup>2</sup> SBTi Near-Term Target




<sup>3</sup> SBTi Net Zero Target



**Table 5:** Quantitative supporting targets of VTU to enable SBTi targets

SDG <sup>4</sup>	Target	Base		Target		Status 2024		Comment
		Year	Value	Year	Value			
 	Use of green electricity	2022	59%	2025	75%	66.4%	🟢	Ongoing, making good progress
	Reduce CO <sub>2</sub> emissions per km travelled (combination of car fleet, business travel and commuting)	2022	100%	2024	90%	1.7%	✖	Reduction of 24% for car fleet were negated by increase in emissions from business travel and commuting

**Table 6:** Qualitative supporting targets of VTU to enable SBTi targets

SDG <sup>4</sup>	Target	Target-supporting measure	Target year	Status 2024	Comment
	Develop a strategy compatible with the goals of the Paris Agreement to reduce CO <sub>2</sub> emissions across the VTU	Creation of an emissions reduction action plan	2024	🔴	Delayed due to lack of resources New target year 2026
 	Conserve/save resources in the offices continuously	Replace existing coffee capsule machines	2024	✖	Replaced at 72 % of offices
		Switch to paper types with a low ecological footprint	2023	✖	Paper types have already been changed at all Austrian locations
		Switch to LED lights	2025	🟢	Ongoing

✖ not reached in time 🟢 ongoing, on track 🔴 ongoing, delayed

## E1-5 – Energy consumption and mix

**Table 7:** Data on purchased energy

		2022	2023	2024
Office space	m <sup>2</sup>	19,050	21,584	21,533
Electricity	kWh	816,677	906,443	981,572
green electricity	%	59.1%	60.7%	65.6%
Heating	kWh	1,545,429	1,564,740	1,556,254
from renewable sources	%	Data limitation	Data limitation	4.4%
Cooling	kWh	72,552	33,473	28,075
Total energy	kWh	2,434,658	2,504,656	2,565,900
from renewable sources	%	19.8%	22.0%	27.8%

<sup>4</sup> Sustainable Development Goal

**Table 8: Energy KPIs**

		2022	2023	2024
Total energy consumption within the organization	GJ	8,765.61	9,016.76	9,237.24
Energy intensity per employee	kWh/FTE	2,202.13	2,093.32	2,373.86
Energy intensity per monetary unit	kWh/mEUR	14,066.39	13,984.67	15,343.38
GHG emissions intensity <sup>5</sup>	t CO <sub>2</sub> e/mEUR	27.73	47.14	44.69

As each VTU product is unique and customized for our clients, calculating its energy consumption is not possible. Therefore also no statements regarding decrease of product energy consumption is possible.

## E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions

**Table 9: Greenhouse gas emissions [t CO<sub>2</sub>e]**

Greenhouse Gas Emissions [t CO <sub>2</sub> e]	2022	2023	2024
<b>Total</b>	<b>4,413.72</b>	<b>8,577.34</b>	<b>7,475.69</b>
<b>Scope 1</b>	<b>591.14</b>	<b>829.32</b>	<b>783.90</b>
Car fleet	591.14	825.53	771.06
Fugitive emissions of AC systems	Data limitations	3.80	12.84
<b>Scope 2</b>	<b>472.22</b>	<b>602.80</b>	<b>536.65</b>
Purchased electricity <sup>6</sup>	92.20	107.20	70.80
Purchased heat	291.42	294.38	195.63
Purchased cooling	11.83	5.36	4.14
Electricity for electric vehicles	76.77	195.87	266.08
<b>Scope 3</b>	<b>3,350.37</b>	<b>7,145.21</b>	<b>6,155.14</b>
Purchased goods and services	279.66	2,753.85	1,683.67
Capital goods	Data limitations	333.43	333.60
Fuel- and energy-related activities not included in scope 1 or 2	171.59	181.94	221.15
Upstream transportation and distribution	Data limitations	0.12	0.02
Waste generated in operations	101.63	66.12	59.01
Business travel	893.93	1,272.52	1,504.35
Employee commuting	1,903.55	2,324.49	2,140.17
Upstream leased assets	Data limitations	16.18	8.07
Downstream transportation and distribution	N/A		
Processing of sold products	N/A		
Use of sold products	Data limitations	196.56	205.10
End-of-life treatment of sold products	N/A		
Downstream leased assets	N/A		
Franchises	N/A		
Investments	N/A		

<sup>5</sup> Scope 3 input was extended from 2023 on, leading to an increased corporate carbon footprint

<sup>6</sup> Numbers shown are market-based emissions; location-based emission numbers are: 2022: 170.2 t CO<sub>2</sub>e; 2023: 187.87 t CO<sub>2</sub>e; 2024: 197.85 t CO<sub>2</sub>e

**Table 10: Car fleet data**

		2022	2023	2024
Number of cars	#	95	143	148
Electric vehicles	%	17.9%	33.6%	38.5%
Hybrid vehicles	%	14.7%	11.2%	10.8%
Gasoline/diesel vehicles	%	67.4%	55.2%	50.7%
Distance travelled	km	2,055,057	3,254,020	3,889,192

**Table 11: Data on water consumption**

		2022	2023	2024
Water consumption	m <sup>3</sup>	2,550.7	2,573.4	5,555.5 <sup>7</sup>
	ML	2.55	2.57	5.56

VTU only uses water during office operations. The water is sourced from the local water network.

**Table 12: Data on waste**

		2022	2023	2024
Waste	m <sup>3</sup>	157.24	177.19	175.16
Hazardous waste <sup>8</sup>	t	Data limitations	3.01	0.13

**Table 13: Data on business travel**

		2022	2023	2024
Car travel	km	1,627,025	2,224,723	2,759,830
Air travel	km	836,018	1,408,920	1,610,614
Rail travel	km	1,463,835	1,178,721	1,141,487

**Table 14: Data on employee commuting**

		2022	2023	2024
Bike	km	249,184	367,204	335,113
Electric Bike	km	55,298	120,677	110,130
Car	km	4,521,721	5,398,958	4,927,123
Electric car	km	115,266	301,232	274,906
Motorscooter/Motorbike	km	71,315	78,777	71,892
Public Transport	km	653,593	459,970	419,771
Train	km	1,311,114	1,281,961	1,169,926

<sup>7</sup> In 2024, actual data with significantly higher consumption were available for several large locations, whereas in previous years, average data per FTE was used more frequently

<sup>8</sup> Hazardous waste consists of batteries from IT equipment as well as hazardous chemical waste from VTUs R&D facility

## **E1-7 – GHG removals and GHG mitigation projects financed through carbon credits**

Currently no disclosure

## **E1-8 – Internal carbon pricing**

Currently no disclosure

## **E1-9 – Anticipated financial effects from material physical and transition risks and potential climate-related opportunities**

Currently no disclosure

## **6.5 Accounting Policies**

### **Emission Calculation Methodology**

The emissions considered for the calculation of VTU's corporate carbon footprint (CCF) include all emissions of the VTU Group (no equity-share approach) and take into account all greenhouse gases covered by the Kyoto Protocol<sup>9</sup>. The emissions were calculated using emission factors from the SimaPro software as well as from scientifically recognized databases such as ecoinvent and DEFRA, or supplier-specific data (using the Global Warming Potential (GWP) 100). For consumption data, primary data was used as far as possible. When primary data was not available, secondary data from recognized sources was used. All spend-based data whose emissions are calculated with USD-based emission factors were converted using the 'EUR per US dollar' exchange rate from WKO statistics. In addition, inflation was taken into account by using the 'US Inflation calculator'.

Changes in the CCF calculation compared to previous years:

- In 2023, the emissions were calculated internally using the SimaPro software. To ensure comparability, the emissions from 2022 were also recalculated using the same methods and emission factors. Therefore, the results in Table 9 may differ slightly from the results reported in the 2022 (calculated by ClimatePartner) and 2023 Sustainability Reports and the Facts and Figures Sheets. The resulting difference in emissions are not significant.
- Due to an expansion of the categories and input data for scope 3 emissions in 2023, the corresponding figures may not be fully comparable with those of previous years.
- Calculation errors in 2023 'employee commuting' emissions and 'fuel- and energy-related activities not included in scope 1 or 2' were discovered and corrected.
- Since 2024, emissions from 'purchased online services' have been included in the scope 3 category 'purchased goods and services'.

### **Car Fleet**

VTU operates a fleet of vehicles consisting of pool cars and company cars, most of which are assigned to specific individuals. The data is based on annual reports from fleet management on the mileage. With the reported average fuel consumption an average fleet consumption was calculated.

### **Air Conditioning Systems**

The refrigerant charge quantities are recorded per location and the conservative value of 1% per year is assumed for the corresponding losses. The reason for this is the lack of transparency regarding the maintenance and operation of the systems at the offices, as these are the responsibility of the building management. If the filling quantity at a location is unknown, the average value of the respective refrigerant is calculated from the known data and used.

<sup>9</sup> carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), hydrofluorocarbons (HFCs), perfluoro-carbons (PFCs), sulfur hexafluoride (SF<sub>6</sub>) and nitrogen trifluoride (NF<sub>3</sub>)

## **Purchased Energy (Electricity, Heating, Cooling)**

VTU purchases all the energy used (since all VTU locations are rented in office buildings, the possibility of producing its own energy is limited), which is largely directly dependent on the office space. The figures are collected by Sustainability department on an annual basis. As consumption data often is only available via annual invoice from building management or energy supplier, the consumption of the calendar year is extrapolated according to available data. Electricity emissions are calculated on both a market-based and a location-based approach.

## **Purchased Goods**

The use of materials is not considered significant for VTU as a service provider. The main input materials for VTU are office supplies and IT equipment. Data is obtained from VTU accounting system.

## **Purchased Services**

VTU purchases subcontractor services for engineering tasks that it cannot offer itself due to lack of expertise or staff shortages. The emissions from subcontractor services were calculated using an expenditure-based approach, with an emission factor derived from VTU's own emissions of 2023, as the purchased subcontractor services are similar to VTU's services. Purchased online services and non-project-related services (occupational physician, waste management officer, cleaning staff, technician, etc.) also fall into this category. Data is obtained from VTU accounting system.

## **Water**

Water consumption data is based on meter readings, where available. At VTU locations where actual consumption values were not available, consumption was extrapolated. The extrapolations were made using a specially calculated average value for water consumption (2.42 m<sup>3</sup> per year per FTE), based on the 18 locations for which actual consumption values were available.

## **Capital Goods**

The capital goods purchased by VTU mainly consist of office furniture and software. Data is obtained from VTU accounting system.

## **Fuel- and Energy-related Activities Not Included in Scope 1 or 2**

In this category, the upstream emissions from purchased fuels, electricity, heat, and cooling, as well as their transport and distribution losses, are included.

## **Upstream Transportation and Distribution**

VTU mainly purchases office and IT equipment, and the upstream transport emissions are included in the emission factors for these items in the category of purchased goods.

VTU distributes IT equipment from several main locations to all branches. The emissions from this distribution are recorded in this category. An evaluation of the amount of equipment issued per country by IT serves as the basis for calculating emissions. The percentage breakdown of equipment per location is then calculated based on the employee figures per location (Power BI report from Controlling). The weight assumptions correspond to those of the same products in category 1.

## **Waste Generated in Operations**

Consumables purchased by VTU, generate waste of the categories mixed municipal waste, cardboard/paper, organic waste, packaging from dual systems, glass (colored/white).

The amount of waste generated at all VTU locations was extrapolated using the usable office space and average values for kg of waste per year and m<sup>2</sup>.

Emissions from the disposal and treatment of waste water at the branches are estimated on the basis of water consumption (category 1). Waste in small quantities of various chemicals occurred at the R&D facility at the branch Grambach and were calculated using the official disposal documents.

## **Business Travel**

Business trips are divided into travel by car, airplane, and train. Additionally, hotel stays are included in the emissions calculation for business trips. The vehicle and railway data originate from internal time recording. Flight data comes from the airlines/travel agencies. Emissions from hotel overnight stays are calculated on a spend-based basis using the amounts spent on hotel nights obtained from VTU accounting system.

## **Employee Commuting**

To analyze employee commuting, a survey is conducted regularly. The results are then extrapolated to the entire workforce. In addition to commuting, the emissions associated with working from home are included in this category. This data is obtained from VTU accounting system.

## **Upstream Leased Assets**

VTU leases printers for its offices. The corresponding emissions are calculated on a spend-based basis, with the basic data coming from the VTU accounting system.

## **Downstream Transportation and Distribution**

The direct 'products' of VTU are projects and files, which are mainly created using digital media, office supplies, and paper documents. No significant quantities of physical products are transported and distributed, so this emission category is not applicable to VTU.

## **Processing of Sold Products**

The direct 'products' of VTU are projects and files. These products do not need to be processed. Thereby this emission category for VTU is not applicable.

## **Use of Sold Products**

The direct 'products' of VTU are projects and files. These products do not generate emissions during use. Downstream emissions of turn key plants were excluded from the calculation of the CCF as they represent a very small part of VTUs portfolio. VTU develops software solutions that are sold to customers. The fees obtained from licenses and sold products were calculated and emissions calculated by using a spent based emission factor.

## **End-of-Life Treatment of Sold Products**

The direct 'products' of VTU are projects and files. These products do not require end-of-life treatment. Downstream emissions of turn key plants were excluded from the calculation of the CCF as they represent a very small part of VTU's portfolio.

Therefore, this emissions category is not applicable to VTU.

## **Downstream Leased Assets**

VTU does not lease assets to other parties. Thereby this emission category is not applicable for VTU.

## **Franchises**

VTU is not in the market of franchises. Thereby this emission category is not applicable for VTU.

## **Investments**

VTU is not an investment company. Thereby this emission category is not applicable for VTU.

## 7 Social – Own Workforce

### 7.1 Material Impacts, Risks and Opportunities

As described in section 5, VTU's double materiality analysis has shown that the workforce of our operations is material in terms of impacts, risks and opportunities for VTU.

Impacts		
Working Conditions	Secure employment	(+) Stable income and security for livelihood through stable employment and attractive and permanent contracts
	Working time	(+/-) Influence of working time on personal well-being and health as well as quality of work
	Adequate wages	(+) Appropriate remuneration ensuring an adequate standard of living increases satisfaction and motivation of employees
	Collective bargaining	(+) Positive influence on satisfaction of employees due to standardized salaries and benefits due to collective agreements (minimum standard guarantee)
	Work-life balance	(+) Good work-life balance for employees through part time and flexible working time models as this contributes to adapt according to the needs of family and free time next to work. This is further supported by the possibility of working remotely part-time where possible
Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	(+) Positive influence on satisfaction of employees and open corporate culture due to elimination of inequalities and discrimination
	Measures against violence and harassment in the workplace	(+) Positive influence on well-being and security creating a healthy surrounding in which people can thrive

Risks/Opportunities		
Working Conditions	Secure employment	(+/-) VTU is (not) an attractive employer by (not) offering secure employment and stable income for potential employees
	Working time	(-) Excessive working time and related stress can lead to negative health effects and consequently to loss of resources due to sick leave or resignation
	Work-life balance	(-) VTU is not an attractive employer due to lacking work-life balance, leading to inability to cover project execution, especially short term project peaks or very specialized project tasks by own personnel and not being able to grow as a company
		(-) Insufficient work-life-balance and related mental stress can lead to negative health effects and consequently to loss of resources due to sick leave or resignation
Equal treatment and opportunities for all	Training and skills development	(-) Inequality in development of in-house personnel (gender, race, educational background) leads to unequal manning of leadership positions. This prevents (not necessarily actively but at least passively) the development of an inclusive and open-minded company culture.
	Measures against violence and harassment in the workplace	(-) VTU is not an attractive employer due to a toxic work environment, leading to inability to find or retain personnel, thereby not covering necessary resources for project execution and not being able to grow as a company
	Diversity	(+/-) Diversity in the workforce enables an inclusive and open-minded company culture. This leads to increased motivation in work, a broader spectrum of ideas and problem solving approaches and therefore to a better execution of projects.

## 7.2 Our Approach

VTU's approach towards its own workforce is rooted in a comprehensive and integrated understanding of corporate responsibility. The relevant topics are not treated as standalone obligations but as essential, interdependent components of a sustainable and resilient organizational culture. The company's CSR Policy and Code of Conduct provide the formal foundation for these commitments, ensuring that they are consistently applied across all subsidiaries, departments, and levels of leadership.

Health and safety are considered fundamental to VTU's operational integrity. The company's philosophy – 'Better safe, than sorry' – reflects a proactive, preventive mindset that prioritizes the well-being of employees, contractors, and all individuals involved in its operations. This is operationalized through a structured EHS management system, led by the Director of EHS & Sustainability and supported by local EHS personnel across all sites. The system emphasizes shared responsibility, transparency, and continuous improvement, with a strong focus on risk prevention, incident learning, and employee participation.

Mental well-being is treated as a core element of employee health and organizational performance. VTU recognizes that psychological safety, emotional resilience, and work-life balance are critical to long-term productivity and satisfaction.

The company's policies explicitly promote a respectful and inclusive work environment, free from harassment and discrimination, and support a culture where mental health is openly discussed and actively supported. HR and EHS & Sustainability departments collaborate to ensure that mental well-being is addressed holistically, alongside physical health and safety.

Diversity, equity, and inclusion (DEI) are embedded in VTU's ethical framework and strategic direction. The company is committed to creating a workplace where all individuals – regardless of gender,



background, or identity – feel valued, respected, and empowered to contribute. DEI is not only a matter of fairness but also a driver of innovation, collaboration, and social impact.

VTU's policies prohibit all forms of discrimination and promote equal opportunity in recruitment, development, and leadership.

Workforce engagement and training are seen as strategic enablers of organizational success. VTU believes that a motivated, skilled, and connected workforce is essential for delivering high-quality results and adapting to future challenges.

Engagement is fostered through open communication, participatory leadership, and a culture of mutual respect. Training is approached as a continuous process, with structured programs, leadership development, and personalized learning paths that align with both individual aspirations and company goals.

Data security and privacy are treated with the same level of seriousness as health and safety. In an increasingly digitalized business environment, VTU recognizes the importance of protecting sensitive information and maintaining trust with clients, partners, and employees. The company adheres to strict legal and ethical standards, including GDPR (General Data Protection Regulation), and has implemented robust technical and organizational measures to safeguard data across all operations and projects.

Together, these principles form a cohesive and forward-looking approach to responsible business conduct. They reflect VTU's commitment to building a safe, inclusive, and future-ready organization that prioritizes people, integrity, and long-term value creation.

## **7.3 Actions**

### **7.3.1 Health and Safety**

VTU's health and safety system is comprehensive, structured, and continuously evolving. It applies to all employees, contractors, and workplaces, including offices, construction sites, and customer locations. Risk assessments are conducted regularly and systematically, taking into account both the nature of the work and the specific conditions of each site. These assessments inform the development of safety protocols, training programs, and emergency response plans tailored to the risks identified.

Mandatory training is provided to all employees, including specialized modules for high-risk activities such as working in confined spaces or in areas with explosion hazards.

First aid and fire safety training are conducted regularly to ensure preparedness. Internal and external occupational health professionals, such as occupational physicians and safety officers, are involved in assessments and are available to employees free of charge for consultations and support.

Incident management is a cornerstone of VTU's safety culture. All incidents – including near misses and unsafe conditions – are reported, investigated, and analyzed to identify root causes and implement corrective actions. Lessons learned are documented and shared across the organization to prevent recurrence. Key performance indicators, such as the Lost Time Injury Rate (LTIR), are used to monitor effectiveness and guide improvements.

Next to incident management the emergency planning and response is important for good preparedness. Therefore VTU has not only emergency plans and trainings at all sites but also an emergency management team for serious incident situations that takes care of things like communication in the background and relieves personnel on site to focus on the tasks at hand.

Employee involvement is actively encouraged through structured communication channels, including safety meetings, inspections, and feedback platforms. In Germany and Austria, formal occupational health and safety committees bring together management, EHS staff, and employee representatives to ensure collaborative decision-making. In project execution, safety is integrated from the planning phase onward. During the design of a plant several types of safety studies and risk assessments are done, the depth and types of study depending on the project. Due to VTU's broad service portfolio, it is not possible

to make a statement about a percentage, but for projects that involve process engineering almost all are undergoing some sort of safety study.

For the execution of projects with extended EHS responsibilities, detailed management plans are developed, and tools like the Last Minute Risk Analysis (LMRA) card are used to assess risks before work begins. Safety is also considered during the design phase.

Beyond regulatory compliance, VTU promotes holistic well-being through ergonomic workplace design, mental health support, and wellness initiatives. Programs such as the Virgin Pulse Go Challenge and Calm app subscriptions encourage physical activity and stress reduction. Flexible work arrangements, including home office options and sabbaticals, support work-life balance and long-term health.

### **7.3.2 Mental Well-being**

VTU's mental well-being strategy is proactive, inclusive, and deeply embedded in its organizational culture. The Employee Assistance Program (EAP) is a central pillar, offering free, confidential counseling for both personal and work-related issues. The EAP is introduced during onboarding and regularly promoted through internal communication to ensure accessibility and awareness.

HR plays an active role in supporting employees facing challenges. Confidential conversations are offered to explore underlying causes of stress or difficulty, and tailored solutions are developed in collaboration with the employee. These may include temporary part-time arrangements, extended leave, or referrals to external professionals.

Flexible working models are a key component of VTU's approach. Employees are encouraged to manage their schedules in ways that support their well-being, and the company supports extended time off through combinations of vacation and compensatory time. These measures have contributed to improved employee feedback on mental health and work-life balance.

VTU also fosters a culture of psychological safety and openness. Managers are trained to recognize signs of burnout and to maintain regular, empathetic communication with their teams. Initiatives such as virtual 'mystery coffee' meetups and internal idea competitions help build community and reduce isolation, particularly in remote or hybrid work settings. The company invests in tools that promote mental well-being, including a meditation app, wellness challenges, and support for sports activities.

### **7.3.3 Diversity, Equity & Inclusion (DEI)**

VTU's DEI strategy is implemented through targeted initiatives, structural policies, and cultural reinforcement. The gender equality initiative in VTU Italy is a flagship example, aiming to increase the proportion of women in leadership and eliminate gender-based pay disparities. This initiative is supported by clear targets, transparent reporting, and leadership accountability.

The company's flat hierarchies and open communication style contribute to an inclusive work environment. Employees report feeling respected and supported, and the company actively accommodates diverse needs and preferences. Training on DEI principles is integrated into the Code of Conduct and delivered regularly to all employees. Managers are expected to lead by example and are supported through workshops on unconscious bias and inclusive leadership.

VTU's anonymous Compliance Line (see chapter 8.3.1 for more details) provides a secure channel for reporting discrimination or harassment.

Compensation policies are aligned with collective agreements and labor contracts, ensuring transparency and fairness. Formal agreements cover working conditions across all subsidiaries, and bonus structures are tied to both individual and company-wide performance.

### **7.3.4 Workforce Engagement and Training**

VTU supports workforce engagement through structured programs, open communication, and continuous development. New employees are welcomed through a buddy system and informal meetups that help them integrate into the company culture. Initiatives like 'CreatePlace4U' invite employees to

suggest improvements, many of which have been implemented, demonstrating the company's responsiveness and commitment to co-creation.

Employees are encouraged to speak openly with management or HR, and a dedicated email address is available for feedback or concerns. There exists an anonymous Compliance Line (see chapter 8.3.1 for more details) that provides an anonymous channel for reporting issues related to behavior, conflicts of interest, or compliance. Real-time feedback is gathered through tools like 'Business Beat' mini-surveys, which inform management decisions and support continuous improvement.

Leadership development is supported through structured programs, including a four-module training series for new managers. Talent development is guided by annual discussions that identify high-potential employees and create personalized development plans.

Annual performance reviews provide a structured opportunity to reflect on achievements, set goals, and plan training. VTU's efforts have been recognized through external certifications such as 'Great Place to Work' and 'kununu Top Company, ' reflecting high levels of employee satisfaction and engagement.

### 7.3.5 Data Security and Privacy

VTU's data security strategy is multi-layered, combining technical defenses, organizational protocols, and employee engagement. The SUSI (Send Us Security Issues) reporting system allows employees and partners to report suspicious activity, such as phishing emails or potential data breaches. The IT department conducts regular phishing simulations and follows up with targeted training to strengthen awareness and resilience.

External cybersecurity experts are engaged to conduct audits and penetration tests, ensuring that systems are robust and up to date. In customer projects, particularly those involving digitalization and automation, VTU's Manufacturing Execution System & Data Analytics team assesses cybersecurity risks and implements tailored protection measures. These include network segmentation, firewalls, and access controls based on the principle of least privilege.

Two-factor authentication and revised office access protocols have been introduced to enhance both digital and physical security. A dedicated Data Protection Officer oversees compliance with GDPR and internal policies, ensuring that data protection is embedded in all aspects of the company's operations and relationships.

## 7.4 Metrics and Targets

VTU's targets across these areas are designed to drive continuous improvement and align with its broader sustainability and business goals. In health and safety, the company aims to eliminate work-related injuries and illnesses, maintain SCC\*\* certification, and expand to ISO 45001.

Mental well-being targets include normalizing mental health conversations, expanding manager training, and improving visibility of support services, building on positive trends in employee survey results. In DEI, VTU is focused on increasing female leadership representation, maintaining high employee satisfaction with inclusivity, and ensuring pay equity through regular analysis and transparent compensation practices.



Engagement and training targets include increasing leadership diversity, maintaining high participation in development programs, and enhancing internal communication and collaboration as the organization grows.

In data security, VTU aims to improve training completion rates, reduce successful phishing attempts, and integrate cybersecurity assessments into all digitalization projects. The company also seeks to strengthen its technical infrastructure and deepen collaboration with clients and partners on data protection.


These targets reflect VTU's commitment to building a safe, inclusive, and resilient organization that supports its people, protects its data, and delivers sustainable value.

In the following, metrics that show the status of VTUs social topics are presented. Further explanations and details on the calculation and data sources can be found in the section accounting policies.

**Table 15:** Quantitative Social Targets of VTU

SDG <sup>10</sup>	Target	Base		Target		Status 2024		Comment
		Year	Value	Year	Value			
	Increase the proportion of women in management	2023	25.4%	2027	29.0%	27.0%	➡	Ongoing, making good progress
	Percentage of appraisal interviews completed on time	2023	62.0%	2024	85.0%	79.0%	✗	Increase from year before but still short of target due to lack of knowledge of required process

**Table 16:** Qualitative Social Targets of VTU

SDG <sup>10</sup>	Target	Target-supporting measure	Target year	Status 2024	Comment
	Company-wide introduction of ISO 45001	Introduce all required processes for ISO 45001	2024	✓	Measures and processes implemented, internal audits started
		External certification according to ISO 45001	2024	✗	External certification delayed

✓ implemented ✗ not reached in time ➡ ongoing, on track

## S1-6 – Characteristics of the undertaking's employees

VTU operates a business without seasonal impacts, so there are no significant fluctuations in the number of employees over a reporting year. In 2024, a total of 106 new employees were hired, but the overall number of employees decreased.

<sup>10</sup> Sustainable Development Goal

**Table 17:** Number of employees (heads) VTU Group and countries according to gender

	VTU Group		AT		DE		IT	
	#	%	#	%	#	%	#	%
Female	450	38.1%	231	38.7%	108	33.4%	41	40.2%
Male	730	61.9%	366	61.3%	215	66.6%	61	59.8%
Other	0	N/A	0	N/A	0	N/A	0	N/A
Not reported	0	N/A	0	N/A	0	N/A	0	N/A
Total	1,180	100%	597	100%	323	100%	102	100%
	CH		RO		PL		BE	
	#	%	#	%	#	%	#	%
Female	38	42.7%	25	64.1%	4	25.0%	3	21.4%
Male	51	57.3%	14	35.9%	12	75.0%	11	78.6%
Other	0	N/A	0	N/A	0	N/A	0	N/A
Not reported	0	N/A	0	N/A	0	N/A	0	N/A
Total	89	100%	39	100%	16	100%	14	100%

**Table 18:** Number of employees (heads) VTU Group according to type of employment

	Permanent	Temporary	Non-guaranteed hours	Full time	Part time
Female	449	1	0	231	219
Male	729	1	0	563	167
Other	0	0	0	0	0
Not reported	0	0	0	0	0
Total	1,178	2	0	794	386

**Table 19:** Number of employees (heads) who left VTU and corresponding turnover rate

	#	Turnover rate
Female	76	16.5%
Male	145	18.9%
Other	1	100%
Not reported	0	N/A
Total	222	18.1% <sup>11</sup>

## S1-7 – Characteristics of non-employee workers in the undertaking's own workforce

Depending on the scope and content of the project, external temporary workers are employed to carry out activities for VTU, which cannot be implemented by regular staff due to resource or competency

<sup>11</sup> In 2024 VTU reduced its overall headcount for about 10% thereby leading to an increased turnover rate.

constraints. This concept is applied to specific topics such as HVAC planning, safety monitoring on construction sites, etc.

**Table 20:** Number of external temporal workers (heads)

	#
Female	1
Male	7
Other	0
Not reported	0
Total	8

## S1-8 – Collective bargaining coverage and social dialogue

**Table 21:** Number of employees (heads) covered by formal agreements regarding working conditions

	#	% of total workforce
Covered by formal agreements	1,180	100%
Not covered by formal agreements	0	N/A

**Table 22:** Coverage rate of collective bargaining and social dialogue

Coverage Rate	Collective Bargaining		Social Dialogue
	Employees – EEA <sup>12</sup>	Employees – Non-EEA <sup>12</sup>	Workplace representation
0 – 19%	-	-	Germany (0%) Belgium (0%) Poland (0%) Romania (0%) Italy (0%)
20 – 39%	-	-	-
40 – 59%	-	-	-
60 – 79%	-	-	Austria (66%)
80 – 100%	Austria (100%) Germany (100%) Belgium (100%) Poland (100%) Romania (100%) Italy (100%)	Switzerland (100%)	-

<sup>12</sup> EEA: European Economic Area

## S1-9 – Diversity metrics

**Table 23:** Composition of governing bodies

	Shareholder Committee		Supervisory Board		Executive Board	
	#	%	#	%	#	%
Female	1	25.0%	1	25.0%	0	N/A
Male	3	75.0%	3	75.0%	5	100%
Other	0	N/A	0	N/A	0	N/A
Not reported	0	N/A	0	N/A	0	N/A
Total	4	100%	4	100%	5	100%

Regarding top management (the first two management levels), 100% come from VTU countries (DE, AT, IT, BE). For all management levels, around 97% come from the countries of VTU branches.

**Table 24:** Number of executives (heads) VTU Group according to gender

	#	% of respective workforce
Female	54	27.0%
Male	146	73.0%
Other	0	N/A
Not reported	0	N/A
Total	200	100%

**Table 25:** Number of employees and executives (heads) VTU Group belonging to a minority or disadvantaged group<sup>13</sup>

	#	% of respective workforce
Employees	11	0.9%
Executives	2	1.0%

**Table 26:** Number of employees (heads) VTU Group according to age range

	#	% of total workforce
Age < 30	194	16.4%
Age 30 – 50	773	65.5%
Age > 50	213	18.1%
Total	1,180	100%

<sup>13</sup> The data is based on figures for people with disabilities; currently, there is no data available for other minority or disadvantaged groups.

## S1-10 – Adequate wages

**Table 27:** Lowest wage in VTU Group compared to adequate wage

	Lowest wage EUR	Adequate wage EUR
Austria	2,465	2,077
Germany	3,062	2,161
Switzerland	4,743	4,505
Italy	1,821	1,749
Poland	1,683	1,091
Romania	1,483	814
Belgium	3,400	2,070

## S1-11 – Social protection

Obligations for pension payments are 100% externally funded (projected once a year). The normal statutory tables and specifications are used to calculate the provisions.

The percentage of the annual salary contributed by the employee or the employer is more than 95%.

**Table 28:** Social protection through public programs or benefits offered

Case	Public Programs
Sickness	Yes, all countries
Unemployment from the moment the employee starts working for the company	Yes, all countries
Accidents at work and disability for work	Yes, all countries
Parental leave	Yes, all countries except Switzerland
Retirement	Yes, all countries

## S1-12 – Persons with disabilities

**Table 29:** Number of employees and executives (heads) VTU Group with disabilities

	#	% of respective workforce
Employees	11	0.9%
Executives	2	1.0%

## S1-13 – Training and skills development metrics

In 2024, a total of 24 new managers started the mandatory leadership training and successfully completed it after 4 modules.

From 2023, 2 open sessions with 22 successful participants were able to complete the remaining 3 modules.



**Table 30:** Training hours per head

	Training hours	#	Average training hours per head
Female	31,756	450	70.6
Male	58,716	730	80.4
Other	0	0	N/A
Not reported	0	0	N/A
Total	90,503	1,180	76.7

**Table 31:** Number of employees (heads) with competence related trainings

	#	% of respective workforce
Female	267	59.3%
Male	436	59.7%
Other	0	N/A
Not reported	0	N/A
Total	703	59.6%

**Table 32:** Number of employees (heads) with ESG relevant trainings

	#	% of total workforce
Training on discrimination and harassment <sup>14</sup>	1,174	94.7%
Training on human rights <sup>14</sup>	1,174	94.7%
Training on compliance and business conduct <sup>14</sup>	1,174	94.7%
Training on IT security <sup>15</sup>	1,159	95.2%
Training on general EHS <sup>15</sup>	1,009	88.9%

Human rights, discrimination, harassment, compliance and business conduct are covered by the CSR policy and the Code of Conduct and trained by VTUs compliance courses. VTU does not employ security personnel, such positions if needed are assigned by our corporate customers.

**Table 33:** Number of employees (heads) with executed performance review

	#	% of respective workforce
Female	332	83.8%
Male	537	76.3%
Other	1	100%
Not reported	0	N/A
Total	870	79.0%

<sup>14</sup> figures also include employees who left the company in 2024, see accounting policy for detail

<sup>15</sup> figures only include employees who were actively working at the company on 31.12.2024

## S1-14 – Health and Safety Metrics

**Table 34:** KPIs for occupational health and safety

	2022	2023	2024
Headcount	1,172	1,293	1,180
Working Hours	1,815,572	2,000,576	1,888,021
Fatalities	0	0	0
Recordable work-related accidents <sup>16</sup>	0	3	1
Recordable work-related ill-health	0	0	0
Non-recordable incidents <sup>17</sup>	16	15	17
Near miss	3	15	19
Lost days	0	13	42
Rate of recordable work-related accidents	0	1.50	0.53

**Table 35:** Branches with a risk assessment

	#	%
Branches	34	100%

**Table 36:** Number of employees (heads) that are represented in an occupational health and safety committee

	#	% of total workforce
Employees	899	76.2%

## S1-15 – Work-life balance metrics

From a legal and contractual perspective, all VTU employees (100%) are entitled to family leave.

**Table 37:** Number of employees (heads) VTU Group that have taken family-related leave

	#	% of total workforce
Female	69	15.3%
Male	60	8.2%
Other	0	N/A
Not reported	0	N/A
Total	129	10.9%

<sup>16</sup> includes lost time accidents and restricted work cases

<sup>17</sup> includes first aid cases and external medical treatment cases

**Table 38:** Number of employees (heads) returned from parental leave and retention rate

	Return rate		Retention rate	
	#	%	#	%
Female	27	39.1%	15	21.7%
Male	45	75.0%	25	41.7%
Other	0	N/A	0	N/A
Not reported	0	N/A	0	N/A
Total	72	55.8%	40	31.0%

## S1-16 – Compensation metrics (pay gap and total compensation)

**Table 39:** KPIs of Remuneration

	2022	2023	2024 <sup>18</sup>
Unadjusted gender pay gap	21.7%	24.7%	22.4%
Adjusted gender pay gap	No calculation		1.5%
Total remuneration ratio	No calculation	0.318	0.339

## S1-17 – Incidents, complaints and severe human rights impacts

**Table 40:** Incidents related to human rights

Number of complaints received through channels where individuals within the company's workforce can raise concerns	9
Total number of reported cases of discrimination, including harassment, during the reporting period	1
Number of serious incidents related to human rights involving the workforce	0
Critical matters reported to the supervisory board	0
Total amount of significant fines, sanctions, and compensation payments related to the aforementioned incidents and complaints	EUR 0

One incident occurred in 2024. It was reported directly to the responsible line management.

A staff member repeatedly made vulgar gestures and inappropriate remarks. The employee did not target anyone specifically; it was a case of general harassment. The HR department had an intensive discussion with the employee and made VTU's stance on this issue clear. The employee was verbally reprimanded.

<sup>18</sup> Due to the adjustment of the calculation method, the figures from previous years are not comparable.

**Table 41:** Incidents regarding IT Security and data privacy

Number of reported emails	2,988
Resulting urgent security information/warnings	0
Cases of successful cyberattacks and phishing	0
Number of reports related to data protection	7
Number of reportable incidents related to data protection	0
Total amount of significant fines, sanctions, and compensation payments related to the aforementioned incidents and complaints	EUR 0

In 2024 twice a malicious email was removed by IT from the affected mailboxes and the respective users were informed. No complaints about data protection were reported from internal and external sources. Of the 7 reported incidents, none were reportable.

## 7.5 Accounting Policies

### Employee and Executive Headcount, Gender, Age, Country, Working and Training Hours and Turnover

Employee data is recognized based on records from the Group's HR system. The total number of employees, including permanent and temporary employees, is expressed on a headcount basis as of year-end.

Executives include all line management positions within the organization. Executives are defined as employees who lead other employees from a disciplinary perspective.

The employee turnover rate is calculated as the number of permanent employees who have left the company within the reporting year divided by the total average number of permanent employees during the reporting year. All numbers are given on a headcount basis.

### Age Distribution

The age distribution is calculated by determining the number of employees within each age group and expressing this as a proportion of the total number of employees. All numbers are given on a headcount basis as of year-end.

### Unadjusted Gender Pay Gap

The unadjusted gender pay gap is calculated using the gross hourly wage based on records from the Group's HR system.

Salaries from Switzerland, Poland, and Romania were converted into euros (conversion rate from 31.12.2024). For employees with all-inclusive contracts, the overpayment was represented by higher weekly working hours.

The unadjusted gender pay gap was calculated as follows:

$$\frac{\text{average gross hourly earnings men} - \text{average gross hourly earnings women}}{\text{average gross hourly earnings men}}$$

### Adjusted Gender Pay Gap

For the adjusted gender pay gap the hourly wages were normalized by multiplying them with factors corresponding to the complexity and scope of responsibility of the respective position, as well as the

years of experience of employees. The factors were calculated using the salary scheme of Austria. In future the factors will be country specific using the salary schemes of each individual country.

Using these normalized gross hourly wages, the adjusted gender pay gap was calculated based on the calculation method of the unadjusted gender pay gap.

## Rate of Recordable Work-related Accidents

The rate of recordable work-related accidents (also known as the LTI rate) includes all reportable work accidents (fatalities and accidents with lost work time) and is calculated as follows:

$$LTIR = \frac{\text{number of reportable accidents} \times 1,000,000}{\text{total hours worked}}$$

## Total Remuneration Ratio

The ratio was calculated as follows:

$$\frac{\text{Average of annual remuneration of all employees (FTE)}}{\text{Annual remuneration of highest paid individual}}$$

using the average annual compensation of the entire workforce (due to the lack of availability of detailed data, calculating the median for the entire workforce was not possible) based on FTE (excluding the costs for the highest-paid person) and the annual remuneration of the highest paid individual (VTU does not pay compensation in the form of shares or equity packages).

## Trainings

The number of trainings was based on the training software used by VTU, training hours were based on the time records from HR.

For metrics that include also employees that left in 2024 the basis for the percentage is given by the number of people booked on the training.

Regarding performance overview data the basis for the percentage is not the total number of employees as of December 31, 2024, but those employees who, due to their start in the company, are scheduled for an employee interview according to the internal procedure.

## Family-related Leave

Family-related leave includes maternity leave, paternity leave, parental leave, and leave for caregivers, granted according to national law or collective agreements. The data is recognized based on records from the Group's HR system.

## Adequate Wage

To identify the adequate wage for each country VTU is operating the data for the minimum wage of Eurostat for 2024-S2 was used for Germany, Poland, Romania and Belgium. For Austria and Italy, the minimum wage according to the collective bargaining agreement was used. For Switzerland the minimum wage of the county with highest minimum wage (Geneva) was used.

The lowest wage for VTU employees was taken from the respective countries salary schemes (Austria, Germany, Italy, Switzerland) or the lowest salary in the countries workforce (Belgium, Poland, Romania).

Exchange rates for calculation of wages in Euro were used from 31.12.2024.

## 8 Governance – Business Conduct

### 8.1 Material Impacts, Risks and Opportunities

As described in the section 5 the double materiality analysis by VTU showed that VTU's business conduct is material in terms of impacts, risks and opportunities for VTU.

Impacts	
Corporate culture	(+) Shared convictions (corporate culture) ensure that decisions and plans can be implemented more quickly and effectively and be seen as beneficial by all stakeholders
Protection of whistleblowers	(+) A good whistleblowing system and process enables a good whistleblowing culture that will mitigate negative impacts due to e.g. corruption, harassment, as information on these non-compliances are received and can be acted upon by the management
Management of relationships with suppliers incl. payment practices	(+) Reliable payment practices ensure that suppliers remain financially stable, thereby reducing the risk of supply chain disruptions

Risks/Opportunities	
Corporate culture	(-/+) A positive, inclusive and open corporate culture attracts and retains good employees to ensure project execution and growth
	(-) To keep employees satisfied it may be necessary to continuously expand work environment and increase expenses (benefits, facilities, working hours, etc.)

### 8.2 Our Approach

At VTU, our approach to corporate culture, business conduct, and supplier relationship is unified by a commitment to ethical integrity, sustainability, and responsible governance. These principles are embedded in a cohesive policy framework comprising the CSR Policy, the Code of Conduct (CoC), and the Supplier Code of Conduct (SCoC). Together, these policies guide behavior across all levels of the organization and throughout the value chain.

The CSR Policy articulates VTU's voluntary commitment to act beyond legal compliance, aligning with international standards such as the UN Global Compact and the Sustainable Development Goals. It applies to all employees, subsidiaries, and business activities, emphasizing on anti-corruption and fair business conduct. The Code of Conduct serves as a practical guide for ethical decision-making, setting clear expectations for integrity, fairness, and transparency in all business dealings. The Supplier Code of Conduct, introduced in 2024, extends these standards to external partners. It mandates compliance with legal and ethical norms, covering areas such as labor rights, environmental responsibility, and anti-corruption. This ensures that VTU's values are consistently upheld across its supply chain.

Management plays a central role in embedding these principles into daily operations. The Executive Board, particularly the CEO, holds direct responsibility for sustainability and compliance. Strategic oversight is ensured through regular coordination with the Director of EHS & Sustainability and the Director Corporate Compliance. Managers at all levels are expected to promote ethical behavior, lead by example, and ensure that policies are understood and applied consistently within their teams. Their active involvement is essential in translating corporate values into concrete actions and fostering a culture of accountability and continuous improvement.

To further sustainability aspects within VTU and in projects for our customers we are part of relevant associations such as EcoVadis, ISPE (International Society for Pharmaceutical Engineering), the Austrian Economic Chamber, UNGC (United Nations Global Compact) and the SBTi (Science Based Targets initiative).

## 8.3 Actions

### 8.3.1 Corporate Culture

VTU's corporate culture is actively shaped through a comprehensive set of internal practices that promote ethical behavior, employee empowerment, and organizational integrity. Central to this is the cultivation of a 'speak-up' culture, where employees are encouraged to give feedback, voice concerns or report misconduct without fear of retaliation. Employees can always approach their management or the HR department to openly discuss if they seek advice, express concerns, or provide feedback. There is also a dedicated email address ([vtu@vtu.com](mailto:vtu@vtu.com)) for such purposes.

This is supported by the VTU Compliance Line, a confidential and independently managed whistleblowing system. It provides a secure channel for reporting any compliance issues or concerns, may it be breaches of the Code of Conduct related to behavior, conflicts of interest, or compliance. It allows both employees and external stakeholders to report confidentially (access can be found via <https://www.vtu.com/en/compliance>).

The Compliance line is run by an external company, reports can be filed via their external homepage. All reports are reviewed by a neutral and independent legal expert, who is able to contact the whistleblower anonymously to receive further information and give feedback. The issue is then escalated appropriately, ensuring transparency and fairness in handling sensitive issues. If substantiated, it is forwarded to the Director Corporate Compliance and addressed through a structured process involving the Compliance Committee. Appropriate actions are taken to address the case and prevent recurrence, any form of retaliation towards the reporting employee are strictly forbidden. Cases regarding critical matters are also reported to the Supervisory Board. Cases that have been reported via other internal channels (line managers, compliance email address) are treated in a similar manner.

The Compliance Committee is also reviewing the effectiveness of the whistleblowing system and the feedback from the stakeholders on the process.

Managers are expected to lead by example, setting the tone for ethical conduct and respectful collaboration. They are responsible for fostering an inclusive and open work environment, where employees feel safe to express concerns and contribute ideas. This leadership role is reinforced through regular training and internal communication, which ensures that all staff understand the company's values, the Code of Conduct, and the procedures for ethical decision-making.

Training is not limited to compliance topics; it also includes awareness-building around diversity, and occupational health and safety, as these topics also are seen as a basis for a sustainable corporate culture. The sessions are tailored to different roles and responsibilities, ensuring relevance and practical application. VTU also encourages continuous learning through internal workshops and knowledge-sharing initiatives.

To monitor and improve its corporate culture, VTU conducts regular internal audits and risk assessments. These include structured reviews of workplace safety, employee well-being, and ethical compliance. Occupational health and safety are managed through dedicated committees, routine inspections, and employee feedback loops.

VTU fosters a culture open for feedback by and discussion with its employees. Open and honest communication is encouraged. Suggestions for improvement are actively solicited and reviewed by the relevant departments, reinforcing a culture of participation and accountability. To enable this culture VTU not only complies with the relevant national statutory requirements (e.g. minimum notice periods regarding operational changes) but also goes further where necessary.

The integration of corporate values into daily operations is further supported by cross-functional collaboration between departments such as HR, EHS & Sustainability, and Corporate Compliance. This ensures that ethical standards are consistently applied across all business units and locations.

### 8.3.2 Business Conduct

VTU enforces a strict zero-tolerance policy toward corruption and unethical practices. Employees are prohibited from offering or accepting gifts, hospitality, or other benefits that could influence business decisions. All financial transactions must be clearly documented and tied to legitimate business purposes. Conflicts of interest must be disclosed and managed transparently, with decision-making reassigned where necessary to ensure impartiality.

The VTU Compliance Line (see Chapter 8.3.1) is a key tool in maintaining ethical business conduct. It allows both employees and external stakeholders to report concerns confidentially. Compliance training is mandatory and regularly updated. Employees are educated on how to recognize and report unethical behavior, and managers are held accountable for fostering a culture of integrity. Annual audits and risk assessments are conducted to monitor compliance with quality management and occupational health and safety standards. While a comprehensive corruption risk assessment is still under development, corruption-related checks are included in financial audits to provide an additional layer of oversight.

### 8.3.3 Management of Relationships with Our Suppliers

VTU manages supplier relationships through a structured and risk-based approach. All new suppliers undergo a prequalification process that includes assessments of safety, environmental performance, and compliance with CSR criteria. Since 2023, this process has been expanded to include questions about sustainability goals, carbon footprint tracking, and labor practices.

Once approved, suppliers are monitored through contract-specific evaluations and, where necessary, audits. The Supplier Code of Conduct is included with all purchase orders from 2025 onward and has been formally acknowledged by top suppliers since 2024. The Quality Management, Procurement and EHS & Sustainability departments collaborate to assess supplier risks, particularly in relation to occupational health and safety. Suppliers also have access to the VTU Compliance Line, reinforcing accountability and enabling them to report concerns anonymously.

## 8.4 Metrics and Targets

VTU is committed to further embedding ethical conduct, sustainability, and responsible business practices across all areas of its operations. The company's overarching goal is to ensure that these principles are not only upheld internally but also extended throughout its value chain. To achieve this, VTU continues to refine its internal processes, strengthen its compliance framework, and deepen engagement with both employees and external partners.

A key focus is on increasing awareness and accessibility of the VTU Compliance Line. Ensuring that all employees and stakeholders are familiar with the platform and confident in using it is essential to maintaining a transparent and accountable organizational culture. This is supported by ongoing training and communication efforts that reinforce the importance of ethical behavior and the mechanisms available to report concerns.

In parallel, VTU is working to enhance its risk assessment capabilities, particularly in relation to corruption and unethical practices. While existing audits provide a solid foundation, the company is developing more targeted assessments (e.g. on the Information Security Management System) that can be used to identify specific risks at the level of countries, branches, or projects. This will allow for more precise mitigation strategies and a more responsive compliance system.

Supplier management is another area of continued development. VTU aims to ensure that the Supplier Code of Conduct is fully integrated into all supplier relationships, not just with key partners. This includes increasing the number of formal acknowledgments and encouraging suppliers to adopt similar standards within their own operations. The company is also exploring ways to make sustainability criteria more robust and potentially binding in supplier evaluations, reflecting a growing emphasis on climate action and ethical sourcing.


Leadership remains central to these efforts. The Executive Board, particularly the CEO, is directly responsible for sustainability and compliance, ensuring that strategic goals are translated into concrete










actions. This leadership commitment is mirrored throughout the organization, with managers and employees expected to contribute to a culture of responsibility, transparency, and continuous improvement.

In the following, metrics that show the status of VTU's governance topics are presented. Details on the calculation and data sources can be found in the section accounting policies.

**Table 42:** Quantitative Governance Targets of VTU

SDG <sup>19</sup>	Target	Base		Target		Status 2024		Comment
		Year	Value	Year	Value			
	Increase EcoVadis sustainability rating	2023	59	2027	70	68	➡	Ongoing, making good progress

**Table 43:** Qualitative Governance Targets of VTU

SDG <sup>19</sup>	Target	Measure	Target year	Status 2024	Comment
	Improve sustainability KPI reporting	Create a guideline for annual emission calculations and an OP for the collection of KPIs	2025	➡	Ongoing, making good progress
		Implement a software solution for simplified data collection KPIs automation	2025	➡	Ongoing, making good progress
  	Create a tool for the selection and development of office locations that meet certain sustainability criteria	Establish a catalogue of requirements for branches regarding green electricity, energy-efficient construction, accessibility by public transport, barrier-free access (mandatory for new branches, as a goal for existing branches where possible)	2024	✗	Low prioritization and delay due to limited resources; general checklist of important factors available
	Integration of the SDG concept in the corporate strategy	SDG workshop with various stakeholders in order to evaluate the SDGs most relevant for VTU	2023	✗	Documents have been prepared; workshop still pending due to limited resources
 	Raising awareness among employees through internal sustainability training	Create an annual training session on general sustainability topics that is mandatory for all employees	2023	✗	Presentation available, no video done yet, needs to be updated
		Set up an annual basic training session on green engineering that is mandatory for all engineers	2023	✗	Low prioritization and delay due to limited resources

✓ implemented ✗ not reached in time ➡ ongoing, on track

<sup>19</sup> Sustainable Development Goal

## Internal Audits

To check the application of VTUs procedures and rules annual internal audits are conducted and the audited content is extended accordingly. Currently internal audits are done for the ISO 9001 and SCC<sup>20</sup> standards as well as ISO 45001 standard starting end of 2024. In 2025 internal audits for ISO 27001 will be implemented.

**Table 44:** Audited branches

	#	%
ISO 9001	34	100%
SCC <sup>20</sup>	14	41.2%
ISO 45001	2	5.9%

## G1-2 – Management of relationships with suppliers

Starting in 2025, the Supplier Code of Conduct has been included as an accompanying document in all VTU orders. To also cover suppliers with ongoing contracts, the SCoC was sent separately to the 10 largest suppliers of recent years for signing.

**Table 45:** Key performance indicators of Supply Chain Management

	#		%
	planned/required	executed	
Evaluation of new suppliers based on sustainability criteria	13	13	100%
Suppliers who have signed the Supplier Code of Conduct (SCoC)	10	7	70.0%
Conducting supplier audits with sustainability criteria	3	3	100%

## G1-4 – Incidents of corruption or bribery

No comprehensive risk assessment regarding the corruption risks of specific countries/branches at VTU has been conducted, but an annual inquiry is carried out as part of the financial audit by an external entity.

<sup>20</sup> VTU has only 14 locations certified according to SCC, so 100% of the certified locations underwent internal audits.

**Table 46:** Incidents related to environmental, social or commercial legislation

Number of violations of environmental laws and regulations	0
Confirmed incidents of corruption or bribery	0
Number of violations of social and economic laws and regulations	0
Number of violations related to anti-competitive behavior, antitrust law, and monopoly practices	0
Number of incidents of health and safety impacts of products and services	0
Total amount of significant fines, sanctions, and compensation payments related to the aforementioned incidents and complaints	EUR 0

## G1-5 – Political influence and lobbying activities

VTU did not conduct any activities and commitments related to exerting its political influence, including its lobbying activities related to its material impacts, risks and opportunities.

**Table 47:** Funding for political influence and lobbying activities

Political funding provided	EUR 0
Funding for lobbying activities	EUR 0

**Table 48:** Financial assistance received from government

Investment subsidies	EUR 20,300
Other benefits/subsidies	EUR 111,300

## G1-6 – Payment practices

Currently no disclosure.

## 8.5 Accounting Policies

### Internal Audits, Management of Relationships with Suppliers

Metrics regarding internal audits and suppliers are received from quality management department which has the ownership over the integrated management system as well as supplier qualification. Numbers regarding internal audits are based on the audit program.

### Incidents of Corruption or Bribery

Metrics regarding corruption and bribery are received from the corporate department compliance.

### Political Influence and Lobbying Activities

Metrics regarding funding and financial transactions are received from accounting department and based on the accounting system of VTU.

## 9 Appendices

### 9.1 GRI Content Index

VTU has reported the information cited in this GRI content index for the period 1/1/2024 to 31/12/2024 with reference to the GRI Standards. GRI 1 used is Foundation 2021. The page numbers referenced in the following table correspond to the chapters in which the content is located.

GRI	Disclosure	Page
<b>GRI 2: General Disclosures 2021</b>		
2-1	Organizational details	5, 7, 8
2-2	Entities included in the organization's sustainability reporting	5, 7
2-3	Reporting period, frequency and contact point	1, 5, 58
2-4	Restatements of information	7, 28
2-5	External assurance	5
2-6	Activities, value chain and other business relationships	8, 14, 15
2-7	Employees	36, 37, 44
2-8	Workers who are not employees	37, 44
2-9	Governance structure and composition	8
2-10	Nomination and selection of the highest governance body	8
2-11	Chair of the highest governance body	9
2-12	Role of the highest governance body in overseeing the management of impacts	11, 12, 16
2-13	Delegation of responsibility for managing impacts	11
2-14	Role of the highest governance body in sustainability reporting	9
2-15	Conflicts of interest	34
2-16	Communication of critical concerns	47, 43
2-17	Collective knowledge of the highest governance body	11
2-18	Evaluation of the performance of the highest governance body	9
2-19	Remuneration policies	8
2-20	Process to determine remuneration	34
2-21	Annual total compensation ratio	43, 44
2-22	Statement on sustainable development strategy	2
2-23	Policy commitments	6, 11
2-24	Embedding policy commitments	6, 8, 40
2-25	Processes to remediate negative impacts	15, 47
2-26	Mechanisms for seeking advice and raising concerns	47
2-27	Compliance with laws and regulations	50
2-28	Membership associations	46
2-29	Approach to stakeholder engagement	15
2-30	Collective bargaining agreements	38
<b>GRI 3: Material Topics 2021</b>		
3-1	Process to determine material topics	17
3-2	List of material topics	17, 18

3-3	Management of material topics	17, 22, 24, 31, 32, 33, 35, 46, 48
<b>GRI 201: Economic Performance 2016</b>		
201-1	Direct economic value generated and distributed	12
201-2	Financial implications and other risks and opportunities due to climate change	22
201-3	Defined benefit plan obligations and other retirement plans	40
201-4	Financial assistance received from government	51
<b>GRI 202: Market Presence 2016</b>		
202-2	Proportion of senior management hired from the local community	39, 44
<b>GRI 203: Indirect Economic Impacts 2016</b>		
203-1	Infrastructure investments and services supported	None
203-2	Significant indirect economic impacts	None
<b>GRI 205: Anti-corruption 2016</b>		
205-1	Operations assessed for risks related to corruption	50
205-2	Communication and training about anti-corruption policies and procedures	40
205-3	Confirmed incidents of corruption and actions taken	50, 51
<b>GRI 206: Anti-competitive Behavior 2016</b>		
206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	50
<b>GRI 301: Materials 2016</b>		
301-1	Materials used by weight or volume	14, 29
<b>GRI 302: Energy 2016</b>		
302-1	Energy consumption within the organization	25
302-3	Energy intensity	25
302-4	Reduction of energy consumption	22
302-5	Reductions in energy requirements of products and services	25
<b>GRI 303: Water and Effluents 2018</b>		
303-1	Interactions with water as a shared resource	26
303-5	Water consumption	26
<b>GRI 304: Biodiversity 2016</b>		
304-2	Significant impacts of activities, products and services on biodiversity	15
<b>GRI 305: Emissions 2016</b>		
305-1	Direct (scope 1) GHG emissions	26, 28
305-2	Energy indirect (scope 2) GHG emissions	26, 28
305-3	Other indirect (scope 3) GHG emissions	26, 28
305-4	GHG emissions intensity	25
305-5	Reduction of GHG emissions	24, 26, 28
305-6	Emissions of ozone-depleting substances (ODS)	N/A
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	N/A
<b>GRI 306: Waste 2020</b>		
306-1	Waste generation and significant waste-related impacts	26, 29
<b>GRI 307: Environmental Compliance 2016</b>		
307-1	Non-compliance with environmental laws and regulations	50

<b>GRI 308: Supplier Environmental Assessment 2016</b>		
308-1	New suppliers that were screened using environmental criteria	50
308-2	Negative environmental impacts in the supply chain and actions taken	50, 15
<b>GRI 401: Employment 2016</b>		
401-1	New employee hires and employee turnover	36
401-3	Parental leave	42
<b>GRI 402: Labor/Management Relations 2016</b>		
402-1	Minimum notice periods regarding operational changes	47
<b>GRI 403: Occupational Health and Safety 2018</b>		
403-1	Occupational health and safety management system	33, 35
403-2	Hazard identification, risk assessment, and incident investigation	33, 34
403-3	Occupational health services	33
403-4	Worker participation, consultation, and communication on occupational health and safety	33, 34
403-5	Worker training on occupational health and safety	33, 34
403-6	Promotion of worker health	33
403-7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	33
403-8	Workers covered by an occupational health and safety management system	33
403-9	Work-related injuries	42, 45
403-10	Work-related ill health	42
<b>GRI 404: Training and Education 2016</b>		
404-1	Average hours of training per year per employee	40, 45
<b>GRI 405: Diversity and Equal Opportunity 2016</b>		
405-1	Diversity of governance bodies and employees	39
405-2	Ratio of basic salary and remuneration of women to men	43, 45
<b>GRI 406: Non-discrimination 2016</b>		
406-1	Incidents of discrimination and corrective actions taken	43
<b>GRI 410: Security Practices 2016</b>		
410-1	Security personnel trained in human rights policies or procedures	40
<b>GRI 414: Supplier Social Assessment 2016</b>		
414-1	New suppliers that were screened using social criteria	50
414-2	Negative social impacts in the supply chain and actions taken	15, 50
<b>GRI 415: Public Policy 2016</b>		
415-1	Political contributions	51
<b>GRI 416: Customer Health and Safety 2016</b>		
416-1	Assessment of the health and safety impacts of product and service categories	33
416-2	Incidents of non-compliance concerning the health and safety impacts of products and services	50
<b>GRI 418: Customer Privacy 2016</b>		
418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	43
<b>GRI 419: Socioeconomic compliance 2016</b>		
419-1	Non-compliance with laws and regulations in the social and economic area	50

## 9.2 GOV-4 – Statement on due diligence

Core Elements	Paragraph references
a) embedding due diligence in governance, strategy and business model	SBM-1, SBM 2, G1-1
b) Engaging with affected stakeholders in all key steps of the due diligence	SBM-3
c) Identifying and assessing adverse impacts	SBM-3
d) Taking actions to address those adverse impacts	E1-1, S1 Actions, G1 Actions
e) Tracking the effectiveness of these efforts and communicating	SBM-2, E1-1, S1 Actions, G1 Actions

## 9.3 IRO-2 – Disclosure requirements

General			
	ESRS Indicator		Page
General disclosures	BP-1	General basis for preparation of sustainability statements	5
	BP-2	Disclosures in relation to specific circumstances	5, 7, 28
Governance	GOV-1	The role of the administrative, management and supervisory bodies	8, 9, 10, 11 12
	GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	10, 11
	GOV-3	Integration of sustainability-related performance in incentive schemes	8
	GOV-4	Statement on due diligence	55
	GOV-5	Risk management and internal controls over sustainability reporting	11, 17, 21
Strategy	SBM-1	Strategy, business model and value chain	8, 12
	SBM-2	Interests and views of stakeholders	15, 16
	SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	17, 18, 21, 22, 31, 46
Impact, risk and opportunity management	IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	17
	IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	55

Environmental			
	ESRS Indicator		Page
E1 – Climate Change	related to GOV-3	Integration of sustainability related performance in incentive schemes	8
	E1-1	Transition plan for climate change mitigation	22
	related to SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	22
	related to IRO-1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	17

	E1-2	Policies related to climate change mitigation and adaptation	22
	E1-3	Actions and resources in relation to climate change policies	22
	E1-4	Targets related to climate change mitigation and adaptation	24
	E1-5	Energy consumption and mix	25
	E1-6	Gross scopes 1, 2, 3 and total GHG emissions	25, 26
	E1-7	GHG removals and GHG mitigation projects financed through carbon credits	28
	E1-8	Internal carbon pricing	28
	E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	28

Social			
ESRS Indicator			Page
S1 – Own Workforce	related to SBM-2	Interests and views of stakeholders	15, 32, 34
	related to SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	17, 21, 31
	S1-1	Policies related to own workforce	32
	S1-2	Processes for engaging with own workers and workers' representatives about impacts	15, 33, 34
	S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	33, 34, 47
	S1-4	Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	33
	S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	35
	S1-6	Characteristics of the undertaking's employees	36, 44
	S1-7	Characteristics of non-employee workers in the undertaking's own workforce	37, 44
	S1-8	Collective bargaining coverage and social dialogue	38, 44
	S1-9	Diversity metrics	39, 44
	S1-10	Adequate wages	40, 45
	S1-11	Social protection	40
	S1-12	Persons with disabilities	40, 44
	S1-13	Training and skills development metrics	40, 44, 45
	S1-14	Health and safety metrics	42, 44, 45
	S1-15	Work-life balance metrics	42, 44, 45
	S1-16	Compensation metrics (pay gap and total compensation)	43, 44
	S1-17	Incidents, complaints and severe human rights impacts	43



Governance			
ESRS Indicator			Page
G1 – Business Conduct	related to GOV-1	The role of the administrative, supervisory and management bodies	8, 9, 10, 11 12
	related to IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	17
	G1-1	Business conduct policies and corporate culture	18, 32, 34, 46, 47, 48
	G1-2	Management of relationships with suppliers	48, 50
	G1-3	Prevention and detection of corruption and bribery	47, 48
	G1-4	Confirmed incidents of corruption or bribery	50, 51
	G1-5	Political influence and lobbying activities	51
	G1-6	Payment practices	51



Please contact Daniel Sandholzer, Director EHS & Sustainability, VTU Top GmbH, at [sustainability@vtu.com](mailto:sustainability@vtu.com) if you have any questions or comments on sustainability matters within the VTU Group, or if you have any suggestions on how to improve our reporting process.

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Project coordination: Daniel Sandholzer

Project team: Daniela Bierbaumer, Michelle Kogler, Sabrina Strudl

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