



elemental

ESG Report
Elemental Holding
2025

Table of contents

LETTER FROM THE PRESIDENT	3
KEY FIGURES 2025	4
GENERAL INFORMATION	5
ESRS 2 General disclosures	5
ENVIRONMENTAL INFORMATION	28
ESRS E1 Climate change	28
ESRS E2 Pollution	39
ESRS E5 Circular economy and resources	41
SOCIAL INFORMATION	49
ESRS S1 Own workforce	49
GOVERNANCE INFORMATION	57
ESRS G1 Business conduct	57
Appendices	61



LETTER FROM THE PRESIDENT

Dear all,

Elemental Capital Group published its first voluntary ESG report in 2021. Today, we are opening a new chapter in our sustainability journey. Our 2025 ESG Report marks a significant milestone for the entire Group, as it is the first report prepared in accordance with the requirements of the EU Corporate Sustainability Reporting Directive (CSRD).

As part of our CSRD obligations and, more importantly, to sharpen our own strategic focus, we conducted a double materiality assessment (DMA) in 2025 to identify the sustainability matters most relevant to Elemental Group from both impact and financial perspectives. The assessment highlighted several key areas: climate change, resource use and circularity, our workforce, and – unique to our business – the societal value generated by recovering critical raw materials. This reflects the critical role Elemental plays in strengthening global supply chain resilience. Collectively, they reflect our ambition to minimise environmental impacts, contribute positively to society and ensure that Elemental Group remains a responsible and resilient employer. The DMA was performed based on both qualitative and quantitative indicators, which will continue to support the monitoring of sustainability performance.

Based on the DMA results, we have also updated the Group's ESG strategy to ensure that our priorities, commitments and actions are fully aligned with the most material topics identified. This renewed strategy strengthens our long-term sustainability direction and anchors our efforts in the areas where we can create the greatest positive impact.

With these priorities in mind, it is worth highlighting one of the projects that best reflects our long term vision – the Polvolt project in Zawiercie, Poland, which holds exceptional importance for the Group's future. Once completed, it will become one of the most advanced metallurgical hubs in this part of the world – processing e-scrap into copper, gold and silver, as well as recovering battery metals such as lithium, nickel, cobalt and manganese from black mass. The European Union has recognised Polvolt as a strategic initiative and included it in the list of 47 priority projects under the Critical Raw Materials Act.

Looking at these achievements, and the challenges we have faced in 2025, one thing is absolutely clear: behind every result stand our people. Across our plants, laboratories and offices, their expertise and unwavering commitment turn ambition into remarkable progress. This will always be our greatest competitive advantage.

We are not simply recycling materials. We are strengthening global supply chains, reducing reliance on mining, and building one of the world's most important circular-metal platforms. We enter the next phase of Elemental Group's development with confidence, energy and ambition. I firmly believe that our strongest achievements still lie ahead.

Paweł Jarski

President of the Management Board
Elemental Holding SA



KEY FIGURES 2025


15

operating countries


1 240

employees worldwide


14 968

hours of training


131 355 t CO₂eq

 carbon footprint (total market-based
scope 1, 2 and 3 emissions)

80%

 of electricity from renewable
energy sources

234 843 t

 of waste subjected
to recovery processes

1 062 117

Revenue (kEUR)


12 662

Investments (kEUR)

Key events in 2025:

Launch of the Polvolt Project
 Polvolt designated as a strategic project under the EU Critical Raw
 Materials Act
 Strategic partnership with Mitsubishi Materials Corporation in the North
 America e-waste recycling market

Awards and accomplishments:

The Best of Industry 4.0 2025 by the WNP.PL (ESM)
 Leader of New Mobility 2025 award by PSNM New Mobility Association (ESM)
 Orły ESG Awards 2025 organized by Rzeczpospolita



GENERAL INFORMATION

ESRS 2 General disclosures

BP-1 Basis for preparation of sustainability statement

From 2025 onwards, we are taking our sustainability efforts to a new level. On a voluntary basis, we will for the first time disclose sustainability information based on the EU Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). However it does not include the disclosures required under Article 8 of Regulation (EU) 2020/852 (EU Taxonomy Regulation). The information presented covers the reporting period (January 1, 2025 – December 31, 2025) and is based on the Group's systems, processes, and internal controls for sustainability reporting.

The sustainability report has been prepared on a consolidated group basis. The report covers the parent company (Elemental Holding SA) and its subsidiaries:

AE Elemental Sp. z o.o.
Colt Recycling LLC
Daniel Ball Converter Recycling, Inc
Elemental Asia SDN BHD
Elemental Battery Metals sp. z o.o.
Elemental Benelux B.V.
Elemental Catalyst Recycling Sp. z o.o.
Elemental Econrg India Private Limited
Elemental EMEA Global Trade Center DMCC
Elemental Geri Dönüşüm Anonim Şirketi
Elemental Global Services S.A.
Elemental h2tech Sp. z o.o.
Elemental Strategic Metals Sp. z o.o.
Elemental Resources Management Ltd.
EMP Recycling
E-Market Sp. z o.o.
Kat Metal Estonia OÜ

Kat Metal Oy
Legend Smelting and Recycling LLC
MD Core LLC
PGM Group Sp. z o.o.
PGM of Texas LLC
Precious Metal for Industry
PT Prime Recycling Indonesia
RECAT GmbH
Romco Elemental Nigeria Limited
Syntom Metal Recycling Sp. z o.o.
Terra Electrorecycling Sp. z o.o.
Terra Recycling Sp. z o.o.
Tesla Electrorecycling Sp. z o.o.
Tesla Recycling Sp. z o.o.

The sustainability report is not included in the Group Management Report.



Not all companies within the Group are included in the sustainability report, as some of them are non-operational, do not perform any waste management activities, or function solely as holding entities. In several cases, the companies' operational scale and environmental footprint are minimal, resulting in limited relevance to the scope and material topics of this sustainability report. Due to the Group's global operations, the process of collecting and consolidating data across all entities is continuously being improved.

BP-2 Disclosure of information related to special circumstances

Some metrics are subject to measurement uncertainty or are partially calculated using value chain estimates. Measurement uncertainty arises primarily from conversions applied to harmonize the input data used in the Scope 3 GHG emissions and the resource use-related metrics. Value chain estimates are mostly prevalent in Scope 3 GHG emissions (See chapter EI-6). More information on significant assumptions made, measurement uncertainties and value chain estimates is disclosed in the accounting policies for the relevant metrics. The metrics have not been validated by an independent external party.

The data presented in this report is based on the information currently available from Group companies. Further improvements in data completeness are planned in future reporting cycles. In addition, structural changes within the Group further limit the comparability of 2025 data with prior years. During 2025, several companies were divested, while new entities were acquired and integrated into the Group. Some Group companies operated only partially in 2024 but significantly increased their activity levels in 2025. These changes in the Group’s composition and operational scale also influence total reported data.

This sustainability report is the Group’s first prepared using the European Sustainability Reporting Standards (ESRS). In prior reporting periods, the Group’s sustainability reporting was prepared in line with the GRI Universal Standards 2021 (GRI 1: Foundation 2021). As a result, the preparation and presentation of sustainability information have changed to reflect the transition to the ESRS reporting framework.

An overview of all incorporation by references used within the Sustainability report is listed in table in Appendices.

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

The Management Board of the parent company serves as the highest management body. It is responsible for managing the Group’s operations and representing the Group externally, setting development priorities, implementing the strategy, and overseeing assets and strategic risks. Members of the Management Board are appointed and removed by the General Meeting of Shareholders.

During the reporting period, the Management Board consisted of:



Paweł Jarski
President
of the Management Board



Adam Kłapszta
Member
of the Management Board



Jakub Łomacz
Member
of the Management Board



Anna Sergiel
Member
of the Management Board

75%
of Management Board
members are men

25%
of Management Board
are women

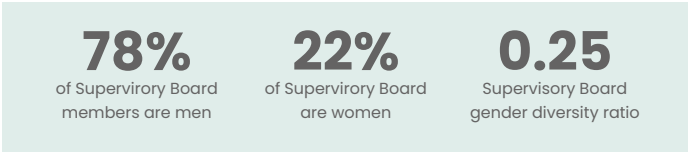
0.25
Management Board gender
diversity ratio

25%
of Board members
who are independent

The Supervisory Board provides independent oversight and supports effective corporate governance, ensuring that the Group is managed in a responsible and sustainable manner. The Supervisory Board consists of 9 members, 8 of whom are independent, supporting objective decision-making and governance aligned with best practice.

During the reporting period, the Supervisory Board consisted of:

- Tomasz Malinowski
- Jarosław Kołkowski
- Heiko Arnold
- Agata Jarska
- Małgorzata Badowska
- David Kemp
- William Thomas Bird
- John Mantzavinatos
- Tomasz Krzywański



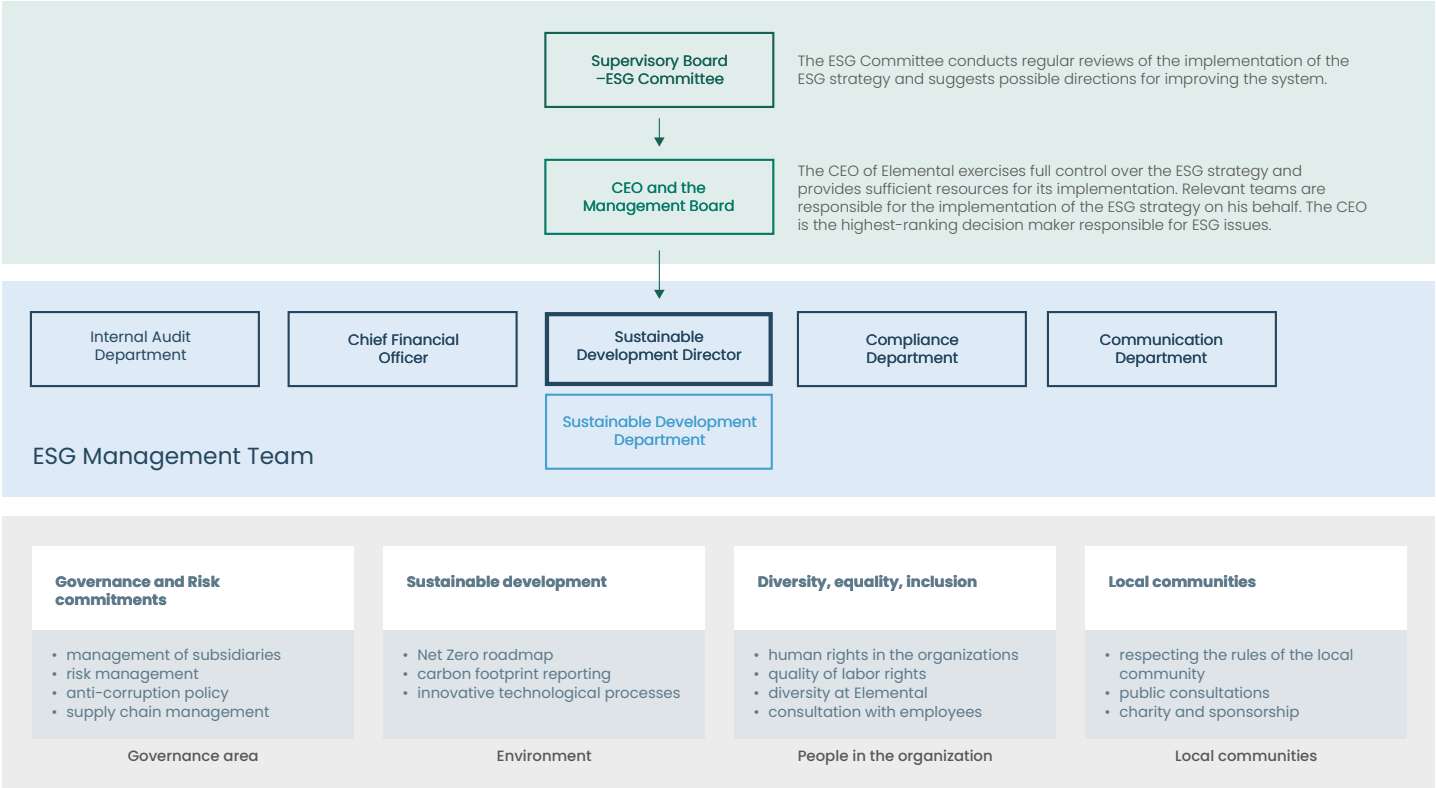
The Group ensures that employees are appropriately represented within its governance framework. Representation mechanisms are designed to reflect the interests of the workforce and support effective dialogue between employees, management, and governance bodies. These mechanisms may include formal participation structures, consultation processes, or other engagement channels, depending on the nature of operations and local regulatory requirements.

Employee representation supports informed decision-making and contributes to the integration of social considerations into governance processes.

Members of the administrative, management, and supervisory bodies collectively possess experience and competencies relevant to the undertaking's key sectors, products, and geographic locations. This experience includes, but is not limited to, industry knowledge, functional expertise, leadership experience, and familiarity with regulatory, environmental, and social contexts in which the Group operates.

The diversity of professional backgrounds supports effective oversight, strategic guidance, and long-term value creation across the Group's operational footprint.

Oversight of the sustainable development strategy is exercised by the Supervisory Board, with management control provided by the Management Board and implementation carried out by the ESG Management Team. The ESG Management Team is responsible for ensuring the ongoing development of sustainability practices, as well as for maintaining, reviewing, and continuously improving the ESG strategy and overseeing its full implementation. The Team also identifies and assesses stakeholder expectations in the context of Elemental's broader commitments.



The administrative, management and supervisory bodies oversee sustainability matters by applying unified risk assessment, internal control, compliance and business continuity mechanisms that are used across all material areas of operation. These responsibilities are reflected in the bodies' mandates and internal governance policies, which cover the identification, assessment and management of sustainability-related impacts, risks and opportunities. As a result, the oversight of sustainability matters is an integral part of existing governance functions and responsibilities, rather than a separate process.

GOV-2 Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

The management of our sustainability strategy is overseen at several organizational levels. The Supervisory Board provides strategic supervision, while the Management Board is responsible for operational control of sustainability matters. Day-to-day implementation is carried out by the ESG Management Team.

The Supervisory Board and Management Board are informed about material impacts, risks and opportunities, the progress of due diligence

The Group has not established sustainability specific control measures or procedures. Instead, sustainability related targets, impacts, risks, opportunities, and relevant skills and expertise, are overseen and managed through the Group's existing governance, internal control, risk management, compliance and decision making processes. The administrative, management and supervisory bodies apply the same mechanisms used for other material business matters, ensuring an integrated approach rather than a separate sustainability framework.

implementation, and the effectiveness of sustainability policies, actions, metrics and targets. These updates are provided on an ongoing basis, ensuring that management bodies have the necessary information.

In 2025, the updated sustainability strategy and the revised Double Materiality Assessment (DMA) were presented to the Management Board, which approved the updated strategy and DMA, confirming their consistency with the Group's long-term objectives and regulatory expectations.

GOV-3 Integration of sustainability-related performance in incentive schemes

Currently, the Group does not have a sustainability-related incentive system in place for its administrative, management, or supervisory bodies,

as sustainability performance results are not yet integrated into the remuneration policy or variable pay systems.



GOV-4 Statement on due diligence

Core elements of due diligence	Parts of the Sustainability report
a) Embedding due diligence in governance, strategy and business model	ESRS 2– GOV-1, GOV 2, GOV-3, SBM-1, SBM-2, SBM-3
b) Engaging with affected stakeholders in all key steps of the due diligence	IRO-1 – ESRS2, EI, E2, E4, E5, SBM-2 – ESRS2, EI, E2, E5, S1, G1
c) Identifying and assessing adverse impacts	SBM-3 – ESRS 2, EI, IRO-1 – ESRS 2, EI, E2, E5, S1
d) Taking actions to address those adverse impacts	EI-3, E2-2, E5-2, S1-4, S1-14
e) Tracking the effectiveness of these efforts and communicating	EI-4, E2-3, E5-3, S1-5

GOV-5 Risk management and internal controls over sustainability reporting

The scope of sustainability reporting in relation to risk management and controls covers both qualitative and quantitative information. Due to the nature of the data, different approaches are used for qualitative and quantitative information. A more thorough risk assessment has been performed for quantitative disclosures, looking at higher data points or requirements based on manual handling of the data, and the possibility of calculation errors.

The Group has established internal control processes to support sustainability reporting. The scope covers the identification, collection, consolidation and reporting of sustainability information, with a focus on material ESRS topics and quantitative data points. The processes include defined roles and responsibilities, documented procedures, methodologies, management review, supported by internal control functions. Sustainability risks are documented, monitored and reported, with sustainability reporting coordinated centrally.

Sustainability related risks are identified and assessed through the double materiality assessment process, supported by management workshops and internal consultations. Risks are assessed qualitatively based on their current or potential impact on financial performance, as well as the likelihood of occurrence over short, medium and long-term horizons.

The main risks identified in relation to sustainability reporting concern the accuracy, completeness and consistency of sustainability information disclosed, particularly in the context of first-time CSRD implementation and the use of estimates and assumptions for certain disclosures. These risks are mitigated through defined reporting instructions, clear allocation of responsibilities, documentation of methodologies and assumptions, and management review of sustainability information prior to disclosure.

The results of the sustainability risk assessment are used to inform internal functions responsible for operations, compliance, health and safety, environmental management, procurement and governance. Identified risks are reflected in operational practices, compliance activities and sustainability disclosures, supporting consistent management of sustainability-related matters across the Group.

Information on sustainability-related risks and their management is communicated to management through established reporting and governance processes. Administrative, management and supervisory bodies receive oversight information on key sustainability risks as part of regular reporting and decision-making processes.



SBM-1 Strategy, business model and value chain

The Group's sustainability strategy incorporates sustainability aspects aimed at long-term goals, focusing on the responsible use of resources and increased operational efficiency. We continuously seek innovative ways to contribute to a sustainable economy and long-term value creation, therefore prioritizing energy efficiency, waste reduction, and circular economy solutions.

The Group's sustainability governance principles and directions

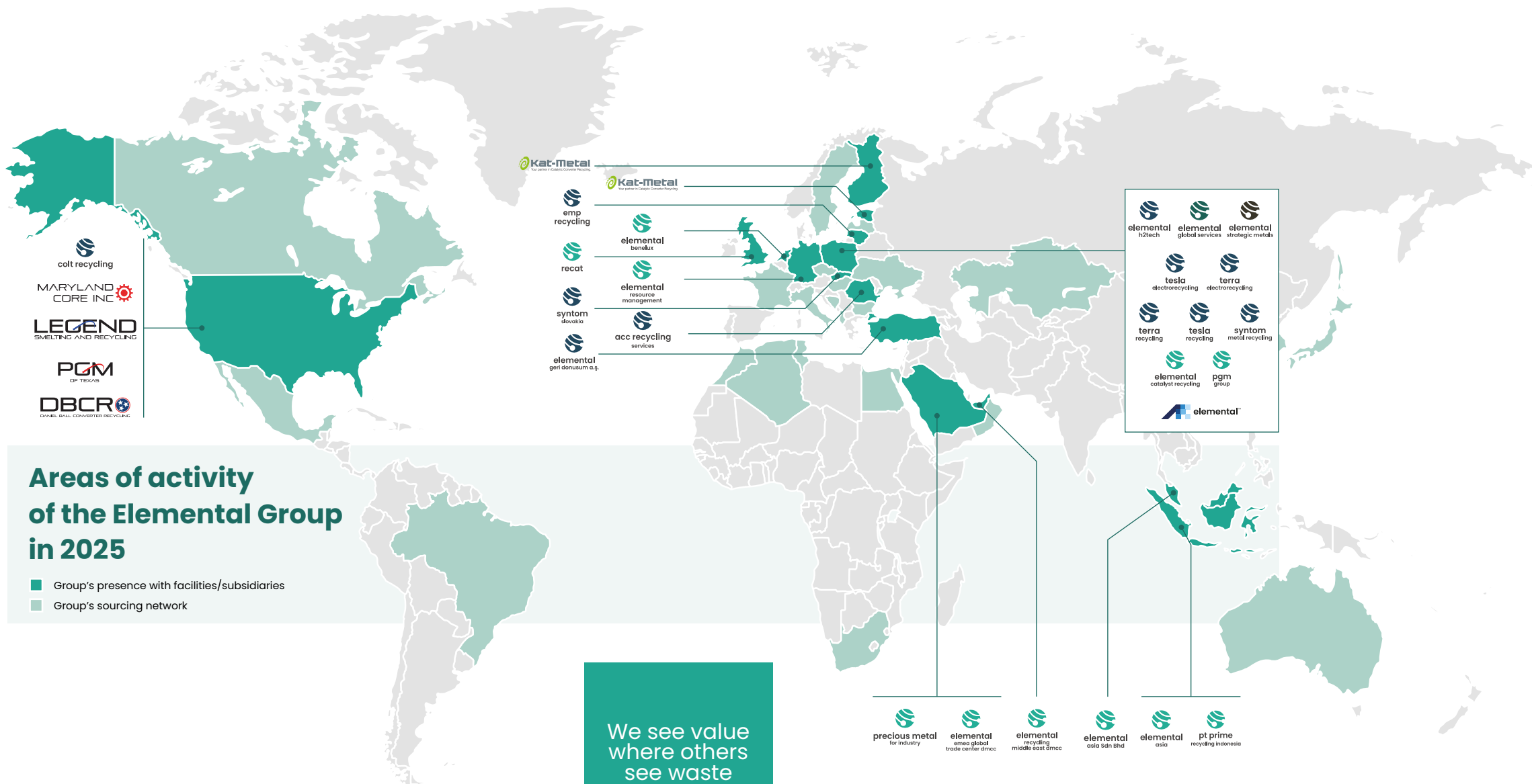
Our core vision is to recover and return as much raw materials as possible to the circular economy cycle, driving profitability while ensuring a positive impact on people and the planet. Our sustainable development strategy is built around four Key Strategic pillars:



These pillars not only help us contribute to the Global Sustainable Development Goals but also create long-term value for our organization and the Group's stakeholders

Elemental Group is a global organization headquartered in Poland, specializing in recycling and urban mining. Established in 2010, the Group has since expanded its presence and today operates across multiple markets worldwide.





Elemental Group provides industrial recycling services focused on the collection, treatment and recovery of waste containing metals and other valuable materials. The Group's core services include recycling of electronic waste, batteries, automotive catalysts and ferrous and non-ferrous metal waste, as well as the sale of recovered secondary raw materials to downstream industrial customers. Recycling activities cover the following key areas:

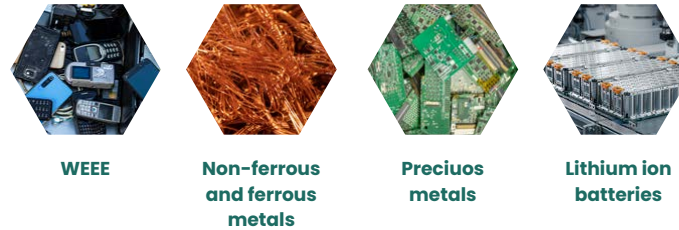
- Recycling of waste electrical and electronic equipment (WEEE)
- Recycling of printed circuit boards (PCBs)
- Recycling of spent automotive catalysts (SAC)
- Recycling of lithium-ion batteries
- Recycling of non-ferrous metals

Waste is collected from various types of entities – both companies and natural persons. Materials go to collection points or directly to a waste processing plants. In the case of waste electronic and electrical equipment, if its condition allows it, it is also possible to prepare it for reuse and thus return it to the market, reducing the amount of electronic waste. Waste that cannot be recycled is subjected to relevant processing. The processed material then goes to entities specializing in final recovery, which involves obtaining the final raw material in the form of precious metals for low-emission and innovative industries. Waste that cannot be recovered is handed over for disposal.

Elemental Group serves industrial customers operating in sectors that require metals and secondary raw materials, including metallurgy, manufacturing and other processing industries. Customers include entities purchasing recovered materials for further processing, as well as counterparties delivering waste for treatment and recovery – both private individuals and legal entities that generate waste and value the quality of our services and customer care.

The Group cooperates with key suppliers operating in Europe, USA, Asia, who provide the essential raw materials to the Group.

Group's main managed material streams:



The Group manages these material flows in line with the waste hierarchy, which prioritizes actions that deliver the greatest environmental benefit:

Prevention – designing processes to minimise waste generation at the source, optimizing collection logistics, and promoting the use of recyclable materials across the value chain.

Preparing for Re use – ensuring that suitable materials undergoes cleaning, repair, or refurbishment in line with health and safety requirements, enabling products or components to be returned to the market.

Recycling – recovering materials from waste and returning them back into manufacturing cycles or upcycled product streams.

Other Recovery – where recycling is not feasible, applying alternative recovery options such as waste to energy processes that enable material or energy output.

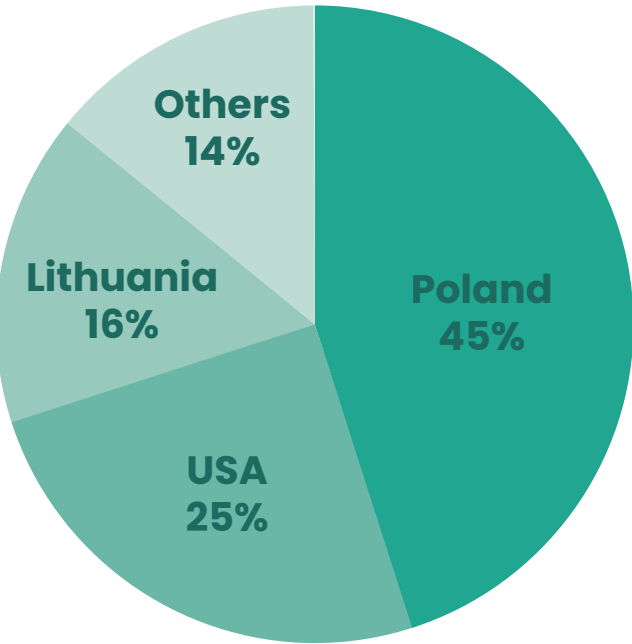
Disposal – As the least preferred option, waste that cannot be prevented, reused, recycled, or otherwise recovered is sent for safe disposal.

By applying this hierarchy across our operations and value chain, the Group seeks to maximize material recovery, reduce environmental impacts, and contribute to the transition toward a circular economy.



The Group’s companies operate globally, which is reflected in the diversity of our workforce. At the end of the reporting year, the Group employed 1 240 employees. More than half of all employees are located in Europe, with nearly half of the Group’s total workforce based in Poland (45%), followed by a significant number in Lithuania (16%). The Group also has a considerable employee presence in the United States (25%). A more detailed distribution is presented in the chart:

Employees by country, headcount



■ Others 14% (in order): Turkey 5%, Nigeria %3, Estonia 1%, UK 1%, UAE 1%, Finland 1%, Saudi Arabia 1%, India 1%, Netherlands <1%, Indonesia <1%, Luxemburg <1%

The Group does not operate in sectors subject to additional disclosure requirements (such as the coal or oil sectors). The Group does not carry out any activities related to fossil fuels.

Elemental Group has defined sustainability-related goals related to its recycling services and recovered material outputs. These goals relate to significant groups of services involving waste treatment, recycling and material recovery.

Elemental Group assesses its recycling services and recovers material outputs in relation to their contribution to waste reduction, resource efficiency and environmental protection. Recycling of electronic waste, batteries, catalysts and metal waste supports circular economy objectives by supplying secondary raw materials and reducing landfill disposal.

Elemental Group’s strategy relates to sustainability matters arising from its recycling activities. The strategy addresses negative impacts associated with greenhouse gas emissions from transport and energy use, air pollution from industrial processes, residual waste generation and occupational health and safety risks. At the same time, the strategy is focused on expanding recycling activities that support the circular economy by increasing recovery of secondary raw materials, reducing waste disposal and reintegrating recovered materials into industrial value chains.

Elemental Group operates in the industrial recycling sector, recovering and processing waste containing metals and other valuable materials. The business model is based on collecting waste from suppliers and waste holders, transforming it through industrial recycling processes, and delivering recovered materials to downstream partners such as smelters and specialized processors. This allows the Group to supply secondary raw

materials into industrial value chains while diverting waste from disposal and supporting circular economy objectives. The Group’s operations integrate waste collection, storage, recovery and recycling with support functions that enable safe and compliant industrial activity. Elemental Group’s value chain covers upstream sourcing of waste and operational inputs, own recycling and support operations, and downstream sale of processed materials and disposal of residual waste. The table in page 14 provides a detailed overview of the value chain.

Elemental Group’s activities require the continuous supply of waste streams containing metals and other valuable materials, as well as operational inputs such as energy, water, chemicals, equipment and specialized services. Waste inputs are sourced from suppliers, waste holders and counterparties. Operational inputs and services, including transport, logistics, utilities, maintenance and IT, are secured through a structured supplier base and procurement processes designed to ensure continuity of operations and compliance with environmental and occupational safety standards.

The Group’s core outputs consist of secondary raw materials, semi-products and recyclable fractions supplied to downstream industrial partners for further processing or use. Additional outputs include residual waste streams transferred to specialized entities. The outcomes of these activities include reduced waste sent to landfill, lower demand for primary raw materials and the availability of recycled metals for industrial value chains. These outcomes support customer access to secondary materials, contribute to environmental protection and support long-term value creation for investors through stable demand for recycling and recovery services.

Upstream value chain includes producers of goods that become waste after use, waste collectors, and suppliers of materials and services supporting recycling operations. Tier 1 suppliers provide waste streams and raw inputs essential for recycling activities, while Tier 2 and Tier 3 suppliers deliver services and materials that support operations. Elemental Group’s own operations

encompass the core recycling processes as well as procurement, logistics, safety and administrative support that sustain industrial activity. Downstream, processed materials are delivered to counterparties such as refineries, smelters and other processors that further refine recovered metals or handle residual non-recyclable waste for final disposal. Elemental Group acts as

an intermediary between waste sources and material users, managing environmental, regulatory and quality requirements across the value chain.

UPSTREAM					OWN OPERATIONS			DOWNSTREAM	
Producers	Suppliers 4	Suppliers 3	Suppliers 2	Suppliers 1	Operational processes	Support processes	Sale	Counterparties	Waste disposal entities
TIER 3	TIER 2	TIER 1			ELEMENTAL GROUP				
Manufacturers of IT, RTV, household appliances, automotive and other equipment	Suppliers of raw materials and materials supplied to suppliers 2 and 3 from TIER 1	Service and product providers	Providers of services and products supporting the implementation of Group's processes	Raw material suppliers, core operations	Waste management (collection, storage, recovery, recycling)	HR	Sales of processed materials	Further processing	Waste disposal processes
Supplying their products to the market, from where these products reach the Companies in the form of waste through Suppliers 1		Suppliers other than Supplier 1, 2 and 4	• utilities • transport/ shipping • IT systems and telecommunications • consulting services • employment agencies • production line maintenance services • physical protection services • suppliers of materials/ equipment used in the production process • supplier of photovoltaic panels • cleaning companies • construction services • office space rental		• procurement • logistics • management • marketing & PR • legal support • IT	• OHS • administration • finance (accounting, controlling)		• recipients of processed waste • refineries • steelworks • other specialized entities	

SBM-2 Interests and views of stakeholders

The Group engages with its stakeholders to understand their perspectives, expectations and concerns in relation to the Group’s activities and sustainability impacts. Stakeholder engagement supports the identification

of material sustainability matters, informs decision-making and contributes to the Group’s ongoing dialogue with parties affected by or influencing its operations.

The Group’s key stakeholders, the categories of stakeholders for which engagement occurs, the purpose of engagement and the engagement methods applied are summarized in the following table.

Key Stakeholders and how we engage with them

Stakeholder	Engagement goals	Engagement method
EMPLOYEES & COLLABORATORS ¹	Building an engaging and safe workplace that cares about the needs of employees and promotes equality and diversity	● Face-to-face meetings & electronic channels (email, Intranet) ● Social activities are supported through volunteering initiatives ● Whistleblower platform ● Meetings with employee representatives
SHAREHOLDERS	Transparent and open communication supporting the development and growth of the Organization. Compliance of the Organization’s operations with the requirements and standards of the capital market	● Regular contact through reporting and regular communication
FINANCIAL INSTITUTIONS	Transparent and open communication supports the Organization’s development and growth, while its operations remain aligned with capital market requirements and standards	● Quarterly financial results and annual reports ● Investor relations meetings and presentations
SUPPLIERS (upstream & downstream)	Building business activities based on transparent and honest relationships with business partners	● Regular, direct contact, surveys and questionnaires for suppliers ● Meetings during trade fairs and events
PUBLIC ADMINISTRATION BODIES, INCLUDING SUPERVISORY & CONTROL BODIES	Conducting activities in accordance with regulations and standards	● Direct communication, events, and conferences ● Reporting is carried out in accordance with the requirements of the relevant authorities
LOCAL COMMUNITIES	Building a positive impact on society	● Direct communication, educational activities and campaigns promoting care for the natural environment ● Whistleblower platform
INDUSTRY ORGANISATIONS	Sharing knowledge, co-creating solutions and initiatives important for the industry	● Membership in organizations ● Communication within working groups ● Conferences and events
MEDIA	Communication with the media expands access to information for many groups of stakeholders	● Communication by answering questions ● Distributing press releases, meeting with journalists

¹ Collaborator – in this report, a person who is not an employee but cooperates with the Elemental Group.

The outcomes of stakeholder engagement support management's understanding of stakeholder expectations and concerns. Relevant insights from engagement activities are used to inform decision-making, including the identification of material sustainability matters.

Based on the outcomes of stakeholder engagement, the Group has developed an understanding of the interests and views of its key stakeholders as they relate to the Group's strategy and business model:

Employees and collaborators value a safe, inclusive and engaging working environment, which supports operational efficiency, employee retention and long-term value creation across the value chain.

Shareholders expect transparent communication, effective governance and sustainable growth, influencing the Group's strategic priorities related to performance, compliance and value creation.

Financial institutions emphasize financial stability, transparency and alignment with capital market requirements, supporting access to financing and continuity of the Group's business model.

Suppliers (upstream and downstream) seek transparent, fair and long-term relationships, which are essential for a resilient, responsible and efficient value chain.

Public authorities and supervisory bodies focus on compliance with regulations and standards, reinforcing the Group's commitment to lawful, ethical and responsible operations.

Local communities expect a positive social impact, aligning with the Group's sustainability commitments and its social license to operate.

Industry organizations and media value knowledge sharing, innovation and transparent communication, supporting the Group's reputation, best practice alignment and strategic development.

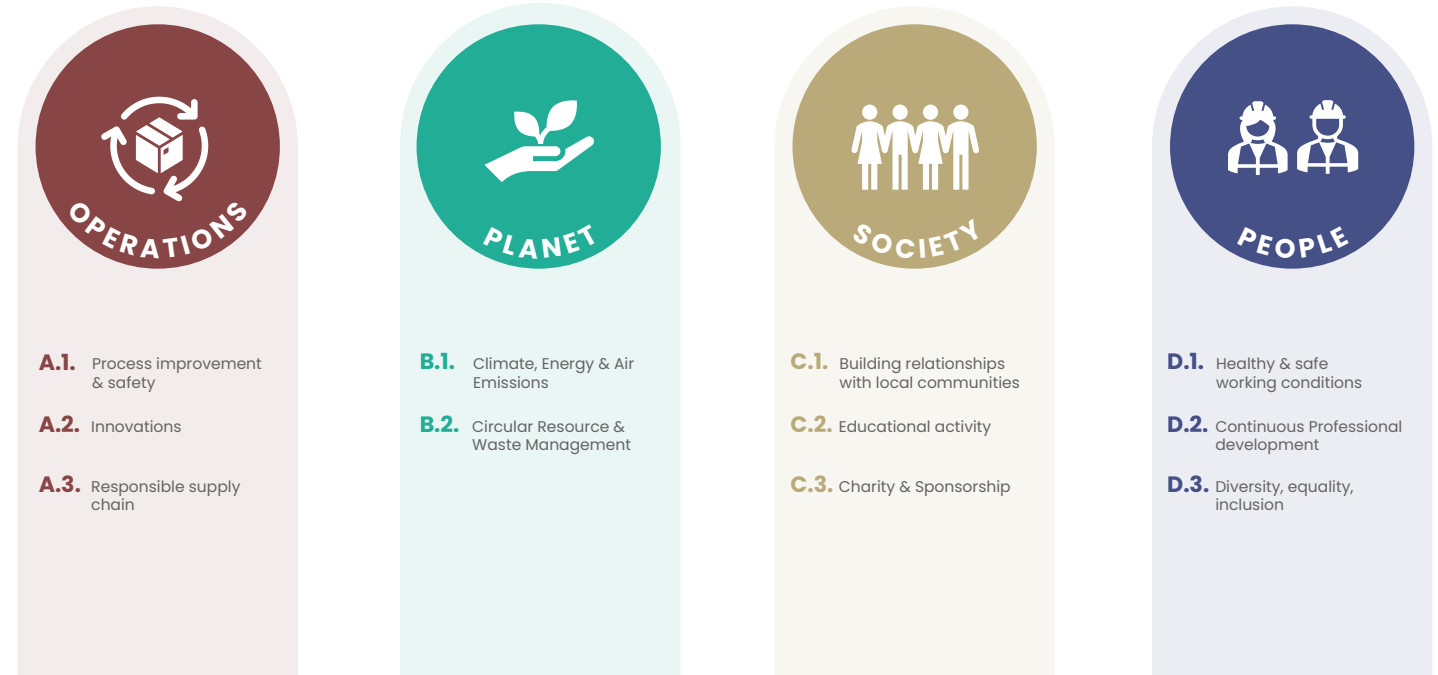
Following the assessment of stakeholder interests and views, the Group reviewed its strategy and determined that amendments were required. During the reporting period, the Group updated its strategy to reflect the integration of sustainability considerations, feedback received through stakeholder engagement, and evolving regulatory and market expectations. The adjustments aim to strengthen the alignment of the Group's strategic

priorities and business model with long-term value creation, responsible business conduct and resilience across the value chain.

The revised strategy incorporates key stakeholder expectations, with a particular emphasis on sustainability-related impacts, responsible business conduct, and long-term value creation. These changes are intended to strengthen alignment between the Group's strategic priorities, its business model, and stakeholder interests across the value chain, while supporting long-term resilience and sustainable growth.

The strategy is structured around key strategic pillars covering operations, planet, society and people. It includes strategic goals, clear targets and actions aimed at improving operational efficiency, reducing environmental impacts, strengthening social responsibility and supporting long-term value creation across the value chain:

Our strategic pillars are shaped by these strategic goals



No significant additional steps are planned to further amend the Group's approach to stakeholder engagement. Existing practices are considered adequate to support current strategic objectives. As no material further steps are currently planned, no significant changes in relationships with or views of stakeholders are expected in the short term. Information on the views and interests of affected stakeholders in relation to sustainability-related impacts is communicated within the Group. This information is shared with administrative, management and supervisory bodies on an ad hoc basis, mainly through internal discussions, management updates and meetings when sustainability-related issues arise. As of the reporting date, formal processes and regular reporting procedures are still under development.

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The results of the double materiality assessment are presented in the materiality matrix and accompanying tables in this Sustainability report. The matrix illustrates the sustainability matters identified as material based on their impact on people and the environment and/or their potential financial effects on the Group. The identified material impacts, risks and opportunities cover environmental, social and governance matter across the Group's own operations and its upstream and downstream value chain

and form the basis for the sustainability topics addressed in the relevant topical sections of this Sustainability report.

Material sustainability topics

ESG Category	Topic	Sub-topic	Impact material	Financial material
Environment	E1 - Climate change	Climate change adaptation	●	●
		Climate change mitigation	●	●
		Energy	●	●
	E2 - Pollution	Pollution of air	●	●
	E5 - Resource Use and Circular Economy	Resources inflows, including resource use	●	
		Resource outflows related to products and services	●	●
		Waste	●	●
	Entity Specific	Environmental pollution		●
		Renewal of waste permits		●
Social	S1 - Own Workforce	Working conditions - Health and safety	●	●
		Working conditions - Adequate wages		●
Governance	G1 Business conduct	Management of relationships with suppliers including payment practices		●
		Corruption and bribery - Incidents		●

	Material from impact and financial perspective
Material from impact perspective	Climate change adaptation Climate change mitigation Energy Pollution of air Resource outflows related to products and services Waste Own workforce working conditions - Health and safety
	E3 Water and Marine Resources E4 Biodiversity and Ecosystems S2 Workers in the Value Chain S3 Affected Communities S4 Consumers and end users
Not material	Environmental pollution* Renewal of waste permits* Working conditions - Adequate wages Management of relationships with suppliers including payment practices Corruption and bribery — Incidents
	Material from financial perspective

* Entity specific information

Material Sustainability-Related IROs

Each material sustainability topic in the following table is presented together with the subtopics in which a significant impact, risk, or opportunity has been identified. It is also indicated whether these impacts, opportunities, and risks occur within the Group’s own operations or within its value chain The Group also discloses whether its activities have a positive or negative impact. The IROs are outlined and described in more detail in the relevant thematic sections of the report.

Sub-Topic	Impact / risk / opportunity description	Actual / Potential	Time horizon	Value Chain
E1 Climate change				
Climate change adaptation	Elemental Group actively promotes and realises a circular economy, which is a key component of its climate change adaptation strategy. By minimizing waste production and maximizing the recovery of secondary materials, the group reduces the consumption of new resources and decreases emissions associated with production. This approach not only reduces the carbon footprint but also enhances the group’s resilience to climate change through more efficient resource use.	Actual	Short Medium Long	OO
	Infrastructure limitations, such as the lack of plans for new photovoltaic farms and the predominance of combustion vehicles, pose a risk that could significantly negatively impact the group’s ability to adapt to climate change. If these issues arise, they may limit the group’s ability to implement its sustainable development strategy and reduce emissions. Additionally, rising energy prices and a lack of transition risk analysis could affect decisions regarding investments in new technologies. Although the group has not yet performed climate risk assessment and has not identified direct climate threats, potential changing weather conditions could impact operational activities and relationships with business partners who expect a proactive approach to sustainability issues.	-	Short Medium Long	OO
Climate change mitigation	Elemental group and its value chain use combustion-based vehicles, that contribute to air pollution and greenhouse gas emissions.	Actual	Short Medium Long	A
	Elemental Group faces several risks related to climate change mitigation efforts that could impact its operations and financial stability. As global and regional regulations become stricter, the company may encounter increased costs related to compliance with new standards aimed at reducing greenhouse gas emissions. These could include investments in cleaner technologies, energy efficiency upgrades, and potential carbon taxes or cap-and-trade systems. Failure to make such investments could limit access to financing, as lenders and investors increasingly require evidence of low-carbon transition efforts. Additionally, failure to effectively implement climate change mitigation strategies could result in reputational damage, as stakeholders increasingly prioritize environmental responsibility. This might lead to a loss of business opportunities or diminished trust from customers, investors, and partners who demand sustainable practices.	-	Short Medium Long	OO

Sub-Topic	Impact / risk / opportunity description	Actual / Potential	Time horizon	Value Chain
Energy	 High energy consumption in Group industrial processes and value chain actor's activities leads to significant greenhouse gas emissions.	Actual	Short Medium Long	A
	 Infrastructure limitations, such as the lack of plans for new photovoltaic farms due to spatial and construction constraints, pose a risk that could restrict the group's ability to further increase the use of renewable energy sources. Without further investments in improving energy efficiency and reducing emissions from traditional sources, the group may face challenges in achieving its climate goals. These challenges may influence investment decisions and collaboration with business partners who expect more decisive actions in energy management and environmental protection.	-	Short Medium Long	OO
	 An increase in electricity costs can directly raise the operational expenses of recycling facilities, which are often energy-intensive, affecting profit margins.	-	Short Medium Long	OO
	 Elemental Group can strengthen its business by expanding the use of renewable energy in its operations. Investments in photovoltaic panels, wind turbines, and renewable energy supply agreements can stabilize energy costs, reduce dependence on fossil fuels, and improve operational efficiency. These actions may also attract sustainability-oriented partners and provide access to financial incentives, generating long-term economic benefits for the Group.	-	Short Medium Long	OO
	 Elemental Group has the opportunity to apply for compensation for energy-intensive sectors and subsectors. Such support can help balance operational costs arising from high energy consumption, which is particularly important in the face of rising energy prices and tightening environmental regulations. The additional funds can be invested in energy-saving technologies and innovative solutions, contributing to increased operational efficiency and a reduction in the carbon footprint. Moreover, obtaining such compensation can strengthen the Group's competitiveness in the market, allowing for more attractive pricing and an increased market share	-	Short Medium	OO

E2 Pollution

Sub-Topic	Impact / risk / opportunity description	Actual / Potential	Time horizon	Value Chain
Pollution of air	 Elemental Group's activities, including transportation and industrial processes, emit air pollutants (e.g. NOx, SOx, particulate matter). Elemental Group recognizes the importance of addressing air emissions, with the primary sources being transportation and industrial activities. While efforts have been made to reduce these emissions, such as using Euro 6 compliant vehicles, there remains room for improvement. Transitioning more of the vehicle fleet to electric or hybrid models and enhancing emission controls in industrial processes are key strategies that could significantly improve local air quality and reduce environmental impact.	Actual	Short Medium Long	OO
	 Group value chain upstream activities, such as electronics manufacturing, batteries manufacturing and downstream activities, such as copper production, manufacture of basic iron and steel emit a lot of air pollution released during processes like soldering, cleaning, and the use of high-temperature ovens	Actual	Short Medium Long	U D
	 Storage of batteries carries the risk of fires, which can lead to the emission of toxic gases and fine particles that degrade air quality. Despite being stored in special containers, fires can occur due to electrical short circuits, mechanical damage, or improper segregation of different types of batteries, which can lead to uncontrolled chemical reactions.	Actual	Short Medium Long	U
	 Emissions from recycling machinery contribute to air pollution, potentially affecting air quality and the health of nearby communities. These emissions can include particulate matter, volatile organic compounds, and other pollutants that may have adverse effects on respiratory health and the environment.	Actual	Short Medium Long	OO
	 The storage of batteries poses a significant fire risk, potentially resulting in the emission of toxic gases and fine particles that degrade air quality. Although batteries are stored in specialized containers, fires can still occur due to factors such as electrical short circuits, mechanical damage, or improper segregation of different battery types. These incidents can lead to uncontrolled chemical reactions, posing safety hazards to personnel and surrounding communities, and potentially causing environmental damage. Effective risk management strategies, including rigorous safety protocols and regular inspections, are crucial to mitigate these risks and ensure safe storage practices. Such events could lead to increased regulatory scrutiny, high remediation costs, potential financial liabilities, and damage to the group's reputation.	-	Short Medium Long	U OO
Entity specific	 Problems with obtaining appropriate environmental permits and non-compliance with dynamically changing regulations can lead to uncontrolled transportation and storage of waste, increasing the risk of ecological disasters and long-term environmental pollution. Such incidents may lead to fines, remediation costs, and temporary shutdowns, causing measurable financial losses.	-	Short Medium Long	A
E5 Resource use & circular economy				
Resources inflows, including resource use	 Thanks to its business profile focused on the circular economy, the group has a significant positive impact on the environment. Most of the used elements are recycled, reused and recovered, which significantly reduces the amount of waste destined for final disposal. This approach limits the need for sourcing new raw materials and supports sustainable resource management.	Actual	Short Medium Long	OO

Sub-Topic		Impact / risk / opportunity description	Actual / Potential	Time horizon	Value Chain
Resource outflows related to products and services		The group's processes enable the transformation of waste into products or semi-products, effectively making waste both the starting and ending points of the technological processing cycle. For non-ferrous waste, including materials such as aluminium, copper, zinc, and brass, as well as ferrous metals, the end products often shed their waste status. This transition positively impacts the environment by reducing waste and fostering a circular economy. The status of the sold "product" is customized to meet customer expectations, thereby increasing its market value.	Actual	Short Medium Long	OO
		One of the key opportunities for Elemental Group in managing resource outflows is the development and implementation of innovative strategic partnerships with technology companies and research institutions. Such partnerships can be a source of new technological solutions that enable more efficient processing and recovery of materials, especially those that are difficult to recycle. Collaborative research and development projects can lead to the development of advanced methods and technologies that reduce the amount of waste sent to landfills and increase the recovery rate of valuable materials. This approach not only strengthens Elemental Group's position as an innovation leader in the recycling industry but also provides a competitive advantage, contributing to a more sustainable economic model.	-	Short Medium Long	OO
Waste		Elemental Group's recycling initiatives significantly contribute to environmental sustainability by treating electronic waste, automotive catalysts waste, ferrous and non-ferrous metals waste and all kind of batteries waste as a valuable resource. By recovering materials such as precious metals such as gold, silver, platinum, other metals such as and copper, aluminium, as well as critical materials lithium, cobalt and nickel and other materials such as glass, plastics for many different sectors, the group not only reduces e-waste in landfills but also supports vital industries. Across all recycling activities, Elemental Group emphasizes the circular economy by ensuring that recovered materials are reintegrated into production cycles. This approach supports the reduction of waste, promotes resource efficiency, and contributes to lowering the carbon footprint of manufacturing processes.	Actual	Short Medium Long	OO
		Despite the recycling efforts, the waste generated from these operations can have a significant negative impact. While recycling aims to minimize waste, there remains a portion of waste that cannot be further processed or reused. This residual waste is often sent to landfills or incinerated, sometimes with energy recovery, but still contributes to environmental degradation. The disposal of non-recyclable waste in landfills can lead to soil and water contamination, while incineration processes may release harmful emissions into the atmosphere.	Actual	Short Medium Long	OO
		Elemental Group has the opportunity to significantly enhance its role in the circular economy by focusing on efficient waste management. One of the key opportunities is the development and implementation of advanced recycling technologies, which can increase the speed and effectiveness of waste processing while reducing the amount sent to landfills. This enables the company to contribute to reducing the negative environmental impact while generating economic value from recovered materials. Moreover, investing in research and development of new waste processing methods, including the recycling of hard-to-process materials, can provide Elemental Group with a competitive advantage. Developing partnerships with other entities in the recycling value chain, such as companies involved in waste collection and segregation, can also aid in optimizing processes and reducing costs.	-	Short Medium Long	OO
		Uncontrolled and improperly managed cases of hazardous waste treatment due to inadequate specialized processing and lack of high-precision technologies may negatively affect environmental safety, leading to increased pollution and ecological degradation. Consequently, the Group may face significant costs related to enhanced operational expenses and potential regulatory penalties. Additionally, such inefficiencies can harm the company's reputation, affecting the trust of stakeholders and business partners, complicating the achievement of strategic goals, and weakening long-term business relationships.	-	Short Medium Long	OO

Sub-Topic		Impact / risk / opportunity description	Actual / Potential	Time horizon	Value Chain
Entity specific	!	Uncontrolled and improperly managed cases of inability to renew waste management permits due to changing or more stringent regulations may negatively affect operations, leading to temporary business closure and loss of revenue. Consequently, the Group may face significant costs related to operational disruptions and potential financial losses. Additionally, such regulatory challenges can harm the company's reputation, affecting the trust of stakeholders and business partners, complicating the achievement of strategic goals, and weakening long-term business relationships.	-	Short Medium Long	OO
S1 Own workforce					
Working conditions – Health and safety	-	Employees' exposure to hazardous substances during the production process poses significant health risks, potentially leading to serious health issues. This endangers the well-being of the workforce.	Actual	Short Medium Long	OO
	-	Employees experience accidents due to Mechanical hazards when working in productions units – injury from sharp objects (glass, sharp objects, etc.), injury when working with tools and equipment, being injured by vehicles (forklifts, trucks).	Actual	Short Medium Long	OO
	!	Ineffective management of the health and safety of workers can lead to a higher incidence of workplace accidents and injuries, resulting in significant legal and financial consequences. This can harm the company's reputation, reduce employee morale, and increase turnover rates. Additionally, it can cause operational disruptions, leading to downtime and reduced efficiency.	-	Short Medium Long	OO
Working conditions – Adequate wages	!	Pay pressure, driven by factors such as rising costs of living, employee expectations, labour market competition, and legislative changes, can significantly impact a company's financial stability by increasing operational costs and reducing profit margins.	-	Long	OO
G1: Business conduct					
Management of relationships with suppliers including payment practices	!	Non-compliance with supplier agreements can result in costly legal disputes, financial penalties, damaged supplier relationships, supply chain disruptions, and harm to brand reputation. These consequences can negatively affect the company's market position, profitability, and ability to secure new business opportunities.	-	Short Medium Long	A
Corruption and bribery – Incidents	!	Corruption incidents risk causing financial and reputational damage, regulatory fines, eroding trust among stakeholders, reducing sales, impacting employee morale.	-	Short Medium Long	OO

IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities

The 2025 double materiality assessment was conducted in accordance with the double materiality principle, assessing sustainability topics from both impact and/or financial materiality perspectives. A sustainability topic is considered material if it meets the defined criteria for impact materiality and/or financial materiality. The assessment was carried out in line with the implementation guidance issued by EFRAG (European Financial Reporting Advisory Group), considering the Group's strategy, business model, value chain and key stakeholders.

Preparation of the list of potentially material sustainability topics

When preparing the list of potentially material sustainability topics, the Group relied on the list of sustainability topics, sub-topics and sub-sub-topics defined by ERS. These sustainability topics were reviewed as part of the double materiality assessment and their content is covered by the relevant ERS topical standards. An assessment was also performed to identify sustainability topics that are not material to the Group. Sustainability topics assessed as not material at this stage were excluded from further stages of the DMA.

Stakeholder assessment and engagement

The Group recognises that, in order to identify its impacts on the environment and society, it is essential to take into account the needs, expectations and views of stakeholders. The Group conducted an assessment of key stakeholders, which was carried out in three stages:

- Development of an expanded list of stakeholders, identifying all stakeholder groups related to the Group whose interests directly or indirectly affect, or may affect, the Group's activities or its relationships within the value chain;
- Assessment of stakeholder importance, taking into account their influence on the Group (actual or potential) and their expressed interests in relation to the Group's activities;

- Identification and engagement of key stakeholders.

Decision-Making Process and Internal Control

As part of the DMA process, dedicated sessions were organised involving experts from various functional areas across different Group companies, as well as all members of senior management. These sessions were used to coordinate the assessment of both impact and financial materiality, discuss the identified impacts, risks and opportunities, and make decisions regarding their materiality.

All materiality assessment results were discussed and validated during these sessions, ensuring robust decision-making, transparency and alignment with the Group's strategic priorities. In this way, effective internal control and senior management involvement in the DMA process were ensured.

Value Chain Analysis

For the purposes of assessing impact and financial materiality, a value chain mapping of the Group's business activities was prepared. Experts from across the Group's companies were involved in this process to help identify how value chains differ across business areas and to determine which impacts, risks and opportunities may arise at different stages of the value chain, including upstream and/or downstream activities.



Impact and financial materiality Assessment

The Group applies the categorisation of time horizons into short, medium and long term, as defined in ESRS.

Based on the expanded list of the Group's impacts, risks and opportunities (IROs), an assessment of impact and financial materiality was carried out across the Group's business activities and value chain.

Sustainability topics were considered material from an impact perspective where they were linked to the Group's actual or potential positive or negative impacts on people or the environment in the short, medium or long term. The materiality of actual negative impacts was assessed based on their severity, while potential negative impacts were assessed based on their severity and likelihood. Impact severity was evaluated based on scale, scope and irremediability. Actual positive impacts were assessed based on their scale and scope, while potential positive impacts were assessed based on scale, scope and likelihood.

Sustainability topics were considered material from a financial perspective where they give rise to risks or opportunities that have, or may have, a significant effect on the Group's financial development, financial position, financial performance, cash flows, access to finance or cost of capital. The materiality of risks and opportunities was assessed based on their magnitude and likelihood of financial effects. Financial materiality was analysed by assessing how identified risks and opportunities may affect the Group's capital categories, including financial, manufactured, human, social and relationship, and natural capital. Financial impacts were assessed on a comparable evaluation scale using expected financial impacts within defined probability intervals, as determined and approved by senior management.

For impact materiality, the assessment considers the scale and scope of impacts on people and the environment and, for negative impacts, their irremediability, reflecting the extent to which adverse impacts can be

reversed or mitigated. Likelihood is assessed for potential impacts. These criteria are applied using defined scoring guidelines to ensure consistent evaluation across sustainability matters.

For financial materiality, risks and opportunities are assessed based on their potential financial magnitude and likelihood over short, medium and long-term horizons, considering the nature of the expected financial effects. The magnitude reflects the potential scale of financial effects on the Group's financial position, performance, cash flows, access to finance or cost of capital over the short, medium and long term, while likelihood reflects the probability of occurrence.

Impacts, risks and opportunities are scored using a numerical scale from 1 to 5. Scores are aggregated using an arithmetic mean and assessed against a predefined materiality threshold of 3.5 to determine which sustainability matters are considered material for reporting purposes.

In the current reporting period, sustainability related risks identified through the double materiality assessment are integrated into the Group's overall risk management framework and considered alongside strategic, operational and financial risks. As this is the Group's first application of the double materiality assessment in accordance with ESRS, sustainability related risks have not yet been fully prioritized in relation to other risk categories. The risks identified do not represent new risks for the Group, but rather reflect risks previously addressed within existing risk management and strategic processes, which are now systematically identified and assessed through the double materiality assessment.

The results of the impact, risk and opportunity assessments are documented and reviewed as part of the Group's internal decision-making processes. Management judgement is applied in validating assumptions, scoring outcomes and the application of materiality thresholds. Internal control procedures are applied to support the consistency, traceability and reliability of the process, including the documentation of inputs, scoring and conclusions used to determine material sustainability matters.

The process to identify, assess and manage sustainability-related impacts and risks provides structured input into the Group's overall risk management processes and supports management's evaluation of the Group's risk profile. While sustainability-related risks are not yet fully embedded into enterprise risk management, the results of the double materiality assessment are used to enhance the Group's understanding of sustainability-related risk exposure. Further integration into the Group's risk management framework is under development.

Opportunities assessed as material are used to update strategic priorities and budget plans, including the development of sustainability-related objectives and key performance indicators, supporting the integration of sustainability considerations into business planning.

The assessment of material impacts, risks and opportunities is based on defined scoring parameters applied consistently across the Group and covering the Group's own operations and, where relevant, its upstream and downstream value chain. Input data is drawn from internal operational and financial information, internal risk registers and forecasts, and relevant external sources, including regulatory developments and market trends. Where direct data is not available, management judgement and expert input are used, with assumptions proportionate to data availability and reliability.

This reporting period represents the Group's first application of process to identify, assess and manage sustainability-related impacts, risks and opportunities under ESRS requirements. In prior reporting periods, sustainability reporting was prepared with reference to the GRI Standards. As a result, the scope, depth and presentation of sustainability-related information differ from previous disclosures, and direct comparability with prior reporting periods is limited.

IRO-2 – Disclosure requirements in ESRS covered by the undertaking’s sustainability statement

ESRS data points from other EU legislation

The following table include all the data points that derive from other EU legislation as listed in ESRS 2, appendix B, indicating where the data points can be found in the sustainability statements, and which data points are assessed as ‘not material’ (NM) or ‘not relevant’ (NR).

Disclosure requirement	Data point		Legislation ²	Page
ESRS 2, GOV-1	21 (d)	Board’s gender diversity	SFDR/BRR	6
	21 (e)	Percentage of board members who are independent	BRR	6
ESRS 2, GOV-4	30	Statement on due diligence	SFDR	9
ESRS 2, SBM-1	40 (d) (i)	Involvement in activities related to fossil fuel activities	SFDR/P3/BRR	NR
	40 (d) (ii)	Involvement in activities related to chemical production	SFDR/BRR	NM
	40 (d) (iii)	Involvement in activities related to controversial weapons	SFDR/BRR	NM
	40 (d) (iv)	Involvement in activities related to cultivation and production of tobacco	BRR	NM
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050	EUCL	NM
	16 (g)	Undertakings excluded from Paris-aligned benchmarks	P3/BRR	NM
ESRS E1-4	34	GHG emission reduction targets	SFDR/P3/BRR	32

Disclosure requirement	Data point		Legislation ²	Page
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	SFDR	33
	37	Energy consumption and mix	SFDR	33
	40-43	Energy intensity associated with activities in high climate impact sectors	SFDR	33
ESRS E1-6	44	Gross scope 1, 2, 3, and total GHG emissions	SFDR/P3/BRR	34
	53-55	Gross GHG emissions intensity	SFDR/P3/BRR	34
ESRS E1-7	56	GHG removals and carbon credits	EUCL	NM
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks	BRR	NM
	66 (a) 66 (c)	Disaggregation of monetary amounts by acute and chronic physical risk; location of significant assets at material physical risk	P3	NM
	67 (c)	Breakdown of the carrying value of its real estate assets by energy-efficiency classes	P3	NM
	69	Degree of exposure of the portfolio to climate-related opportunities	BRR	NM
ESRS E2-4	28	Amount of each pollutant listed in annex II of the E-PRTR regulation emitted to air, water, and soil	SFDR	40

² Legislation: SFDR – Sustainable Finance Disclosure Regulation; P3 – EBA Pillar 3 disclosure requirements; BRR – Climate Benchmark Standards Regulation; EUCL – EU Climate Law

Disclosure requirement	Data point		Legislation ²	Page
ESRS E3-1	9	Water and marine resources	SFDR	NM
	13	Dedicated policy	SFDR	NM
	14	Sustainable oceans and seas	SFDR	NM
ESRS E3-4	28 (c)	Total water recycled and reused	SFDR	NM
	29	Total water consumption in m3 per net revenue on own operations	SFDR	NM
ESRS E4, SBM-3 (ESRS 2)	16 (a) (i)	Activities negatively affecting biodiversity-sensitive areas	SFDR	NM
	16 (b)	Land degradation, desertification, or soil sealing	SFDR	NM
	16 (c)	Threatened species	SFDR	NM
ESRS E4-2	24 (b)	Sustainable land/agriculture practices or policies	SFDR	NM
	24 (c)	Sustainable oceans/seas practices or policies	SFDR	NM
	24 (d)	Policies to address deforestation	SFDR	NM
ESRS E5-5	37 (d)	Non-recycled waste	SFDR	46
	39	Hazardous waste and radioactive waste	SFDR	46
ESRS S1, SBM-3 (ESRS 2)	14 (f)	Risk of incidents of forced labour	SFDR	NM
	14 (g)	Risk of incidents of child labour	SFDR	NM
ESRS S1-1	20	Human rights policy commitments	SFDR	50
	21	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	BRR	50
	22	Processes and measures for preventing trafficking in human beings	SFDR	50
	23	Workplace accident prevention policy or management system	SFDR	51

Disclosure requirement	Data point		Legislation ²	Page
ESRS S1-3	32 (c)	Grievance/complaints-handling mechanisms	SFDR	51
ESRS S1-14	88 (b) and (c)	Number of fatalities and number and rate of work-related accidents	SFDR/BRR	56
	88 (e)	Number of days lost to injuries, accidents, fatalities, or illness	SFDR	56
ESRS S1-16	97 (a)	Unadjusted gender pay gap	SFDR/BRR	NM
	97 (b)	Excessive CEO pay ratio	SFDR	NM
ESRS S1-17	103 (a)	Incidents of discrimination	SFDR	56
	104 (a)	Non-respect of UNGPs on Business & Human Rights, ILO principles, or OECD guidelines	SFDR/BRR	56
ESRS S2, SBM-3 (ESRS 2)	11 (b)	Significant risk of child labour or forced labour in the value chain	SFDR	NM
ESRS S2-1	17	Human rights policy commitments	SFDR	NM
	18	Policies related to value chain workers	SFDR	NM
	19	Non-respect of UNGPs on Business & Human Rights, ILO principles, or OECD guidelines	SFDR/BRR	NM
	19	Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	BRR	NM
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	SFDR	NM
ESRS S3-1	16	Human rights policy commitments	SFDR	NM
	17	Non-respect of UNGPs on Business & Human Rights, ILO principles, or OECD guidelines	SFDR/BRR	NM
ESRS S3-4	36	Human rights issues and incidents	SFDR	NM

² Legislation: SFDR – Sustainable Finance Disclosure Regulation; P3 – EBA Pillar 3 disclosure requirements; BRR – Climate Benchmark Standards Regulation; EUCL – EU Climate Law

Disclosure requirement	Data point		Legislation ²	Page
ESRS S4-1	16	Policies related to consumers and end-users	SFDR	NM
	17	Non-respect of UNGPs on Business and Human Rights and OECD guidelines	SFDR/BRR	NM
ESRS S4-4	35	Human rights issues and incidents	SFDR	NM
ESRS G1-1	10 (b)	United Nations Convention against Corruption	SFDR	58
	10 (d)	Protection of whistleblowers	SFDR	NM
ESRS G1-4	24 (a)	Fines for violation of anti-corruption and anti-bribery laws	SFDR/BRR	60
	24 (b)	Standards of anti-corruption and anti-bribery	SFDR	60

The material impacts, risks and opportunities identified through the double materiality assessment form the basis for determining the sustainability matters and related information disclosed in this Sustainability report. For each sustainability matter assessed as material, the Group evaluated which information is necessary to provide a complete, balanced and decision-useful understanding of the material impacts, risks and opportunities. In determining the information to be disclosed, the Group applied the materiality thresholds and assessment criteria defined as part of the double materiality assessment and considered the relevance of qualitative and quantitative information, the nature and scale of the impacts, risks and opportunities, and the information needs of users of the Sustainability report. Where information required by ESRS was assessed as not material at the information level, it has been omitted in accordance with ESRS requirements.



² Legislation: SFDR – Sustainable Finance Disclosure Regulation; P3 – EBA Pillar 3 disclosure requirements; BRR – Climate Benchmark Standards Regulation; EUCL – EU Climate Law

ENVIRONMENTAL INFORMATION

ESRS E1 Climate change

ESRS 2 GOV-3-EI Integration of sustainability-related performance in incentive schemes

During the reporting period, the remuneration of the Group's administrative, management, and supervisory bodies were not linked to climate related aspects.

E1-1 Transition plan for climate change mitigation

The Group has not yet adopted a climate change mitigation transition plan as required by the European Sustainability Reporting Standards (ESRS E1). However, the Group acknowledges the importance of such a plan to ensure long-term operational sustainability, alignment with the goals of the Paris Agreement, and the commitment to climate neutrality by 2050. Considering these commitments, the Group is currently assessing potential strategic, technological, and investment solutions that will form the basis of the future plan. The plan will include specific GHG reduction targets, key measures for emission reduction, investment directions, and alignment with the principles of the EU Taxonomy Regulation. The Group intends to develop the transition plan and present it publicly by 2028.

ESRS 2 SBM-3-EI Material impacts, risks and opportunities and their interaction with strategy and business model

The Group is currently building its framework for assessing climate related risks. A comprehensive climate risk assessment and the identification of specific risks are planned as part of future ESG development activities. However, potential changes in weather conditions may affect operational activities and relationships with business partners who expect proactive climate-related actions. The scope and approach to climate-related impact and risk identification, as well as adjustment of strategy and business analysis are reviewed as part of the ongoing development of the Group's sustainability management practices.

ESRS 2 IRO-1-EI Description of the processes to identify and assess material climate-related impacts, risks and opportunities

Disclosure of results of materiality assessment

In the following table is a description of the Group's material impacts, risks and opportunities related to climate change and energy. The identified IROs relate to climate change adaptation and mitigation and energy use, including positive impacts arising from the Group's circular business model, as well as negative impacts and risks linked to greenhouse gas emissions, energy-intensive operations, infrastructure limitations. The process for identifying and assessing material impacts, risks and opportunities is outlined in ESRS 2 IRO-1.



Sub-Topic	Value chain location	Detailed description	Impact / Risk	Status	Time horizon
Climate change adaptation	Actual	Elemental Group actively promotes and realizes a circular economy, which is a key component of its climate change adaptation strategy. By minimizing waste production and maximizing the recovery of secondary materials, the group reduces the consumption of new resources and decreases emissions associated with production. This approach not only reduces the carbon footprint but also enhances the group's resilience to climate change through more efficient resource use.	Positive impact	Actual	short, medium, long term
Climate change adaptation	Own operations	Infrastructure limitations, such as the lack of plans for new photovoltaic farms and the predominance of combustion vehicles, pose a risk that could significantly negatively impact the group's ability to adapt to climate change. If these issues arise, they may limit the group's ability to implement its sustainable development strategy and reduce emissions. Additionally, rising energy prices and a lack of transition risk analysis could affect decisions regarding investments in new technologies. Although the group has not yet performed climate risk assessment and has not identified direct climate threats, potential changing weather conditions could impact operational activities and relationships with business partners who expect a proactive approach to sustainability issues.	Risk	-	short, medium, long term
Climate change mitigation	Across	Elemental group and its value chain use combustion-based vehicles, that contribute to air pollution and greenhouse gas emissions.	Negative impact	Actual	short, medium, long term
Climate change mitigation	Own operations	Elemental Group faces several risks related to climate change mitigation efforts that could impact its operations and financial stability. As global and regional regulations become stricter, the company may encounter increased costs related to compliance with new standards aimed at reducing greenhouse gas emissions. These could include investments in cleaner technologies, energy efficiency upgrades, and potential carbon taxes or cap-and-trade systems. Failure to make such investments could limit access to financing, as lenders and investors increasingly require evidence of low-carbon transition efforts. Additionally, failure to effectively implement climate change mitigation strategies could result in reputational damage, as stakeholders increasingly prioritize environmental responsibility. This might lead to a loss of business opportunities or diminished trust from customers, investors, and partners who demand sustainable practices.	Risk	-	short, medium, long term
Energy	Across	High energy consumption in Group industrial processes and value chain actors' activities lead to significant greenhouse gas emissions.	Negative impact	Actual	short, medium, long term
Energy	Own operations	Infrastructure limitations, such as the lack of plans for new photovoltaic farms due to spatial and construction constraints, pose a risk that could restrict the group's ability to further increase the use of renewable energy sources. Without further investments in improving energy efficiency and reducing emissions from traditional sources, the group may face challenges in achieving its climate goals. These challenges may influence investment decisions and collaboration with business partners who expect more decisive actions in energy management and environmental protection.	Risk	-	short, medium, long term
Energy	Own operations	An increase in electricity costs can directly raise the operational expenses of recycling facilities, which are often energy-intensive, affecting profit margins.	Risk	-	short, medium, long term

Sub-Topic	Value chain location	Detailed description	Impact / Risk	Status	Time horizon
Energy	Own operations	Elemental Group has the opportunity to apply for compensation for energy-intensive sectors and subsectors. Such support can help balance operational costs arising from high energy consumption, which is particularly important in the face of rising energy prices and tightening environmental regulations. The additional funds can be invested in energy-saving technologies and innovative solutions, contributing to increased operational efficiency and a reduction in the carbon footprint. Moreover, obtaining such compensation can strengthen the Group's competitiveness in the market, allowing for more attractive pricing and an increased market share.	Opportunity	-	short, medium term
Energy	Own operations	Elemental Group can strengthen its business by expanding the use of renewable energy in its operations. Investments in photovoltaic panels, wind turbines, and renewable energy supply agreements can stabilize energy costs, reduce dependence on fossil fuels, and improve operational efficiency. These actions may also attract sustainability-oriented partners and provide access to financial incentives, generating long-term economic benefits for the Group.	Opportunity	-	short, medium, long term

The Group identifies its impacts on climate change through the monitoring of greenhouse gas emissions and energy consumption arising from its own operations and the value chain. This process is supported by operational data collected across business units and reviewed by relevant management functions. The process focuses on emissions from energy use, industrial recycling processes and transport activities, using quantitative operational and energy data. Greenhouse gas emissions are measured and disclosed by Scope 1, Scope 2 and Scope 3 (details on chapter E1 6).

Double materiality assessment enabled the Group to identify climate and energy-related considerations relevant to its business. These include potential exposure to rising energy prices, stricter environmental and climate-related regulations and related compliance costs, as well as opportunities associated with compensation mechanisms for energy-intensive sectors. In addition, during the assessment Group identified opportunities to increase the use of renewable energy and energy-efficient technologies within own operations to reduce emissions intensity and improve cost stability.

Beyond emissions and energy monitoring, the Group has not yet established a formal process for identifying or assessing climate-related physical risks or transition risks and opportunities. Assets and business activities have not been systematically screened for exposure or sensitivity to climate-related hazards or transition events. The outputs of the double materiality assessment are used for further development of climate-related risk management processes.

E1-2 Policies related to climate change mitigation and adaptation

The management of climate-related impacts, risks and opportunities is addressed through ESG Strategy and Environmental Management Strategy. These Group-level documents are approved by the Management Board. These strategic documents set out sustainability principles that guide the Group's ongoing climate change mitigation and adaptation efforts. The Group is implementing these measures in its operations:

- reducing greenhouse gas emissions by improving waste collection, sorting and recycling processes, helping divert waste from landfill.

- strengthening material circularity by recovering metals and other secondary raw materials.
- improving energy efficiency across waste-management activities and increasing the use of renewable energy in facilities.
- preventing pollution by applying best-practice standards in the handling of waste.
- supporting the circular economy through cooperation with partners, customers and suppliers to promote responsible resource use.

- lowering transport-related emissions through logistics optimisation and a gradual shift toward low-emission vehicles.
- encouraging waste prevention and responsible consumption through awareness-raising and customer education

E1-3 Actions and resources in relation to climate change policies metrics and targets

Elemental Group recognises that its operations in the waste management and recycling sector play a significant role in addressing climate change. By recovering valuable materials and diverting waste from landfill, the Group directly contributes to reducing greenhouse gas emissions and supporting national and EU climate objectives. At the same time, the Group acknowledges its responsibility to minimise the environmental impact of its own operations and to enhance the sector's potential to support climate change mitigation and adaptation.

The Group applies nature and circular-economy-based solutions, such as increasing material recovery rates, improving the quality of secondary raw materials, and reducing the need for carbon-intensive primary extraction. Through advanced technological processes, the Group reduces pollution and promotes more efficient use of resources. Elemental Group also recognises that achieving long-term climate neutrality requires a continuous reduction of both direct and indirect emissions throughout the value chain.

In 2025 Group implemented a range of actions that directly support its climate-related policies and long-term decarbonisation ambitions. These actions focus on scaling circular-economy solutions, reducing greenhouse gas emissions across operations, and investing in technologies that lower energy use and environmental impact.

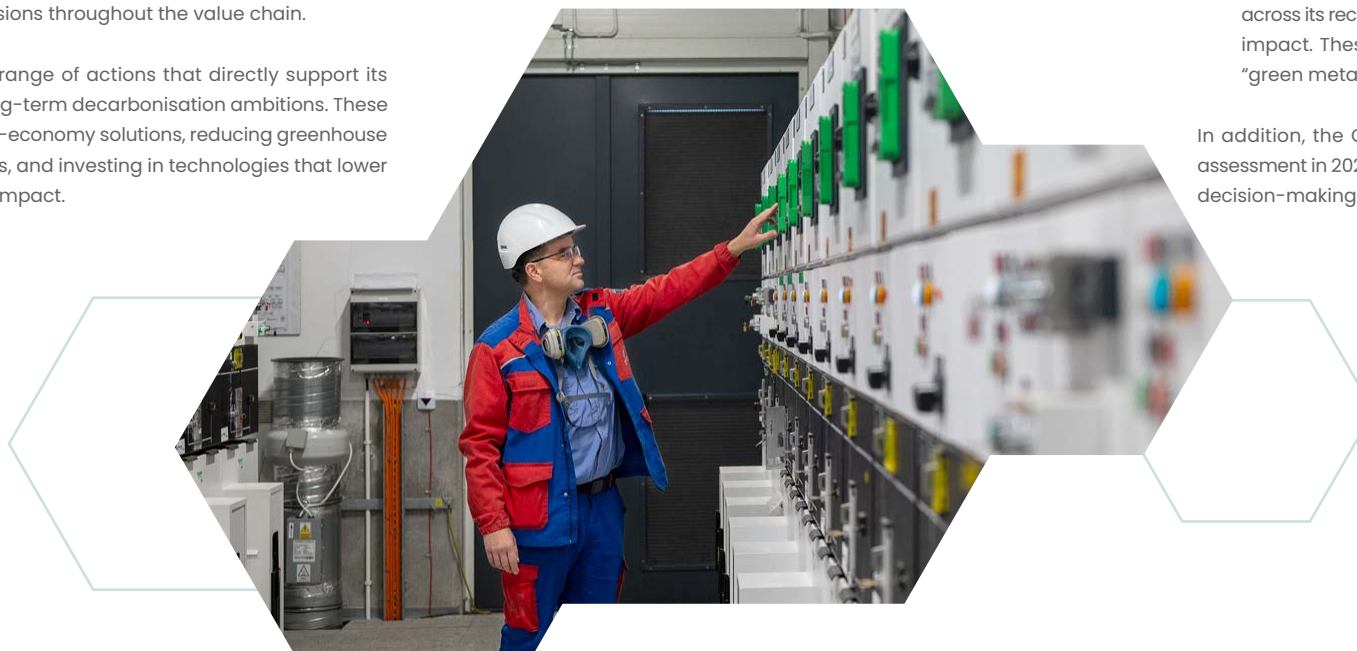
I. Actions supporting climate-change mitigation:

- 1. Expansion of sustainable recycling infrastructure.** The Group continued to invest in new and more efficient recycling facilities, which increase global secondary-material recovery and reduce waste sent to landfill.
- 2. Strengthening battery-metal recycling capacity.** Elemental Group advanced the EU-supported Li-ion battery recycling plant in Zawiercie, Poland, a key climate-aligned project that supports Europe's shift to low-carbon mobility and reduces reliance on carbon-intensive primary mining.
- 3. Scaling platinum-group metal (PGM) recovery.** The Group expanded its processing capabilities for critical metals such as platinum, palladium and rhodium — metals essential for renewable energy technologies and EVs—thereby reducing emissions associated with primary extraction.

II. Resources allocated to climate-related initiatives:

- 1. Significant climate-aligned financing.** In 2025, Elemental Group secured over \$260 million in funding to support further development of energy-efficient recycling operations, facility upgrades and circular-economy projects. This funding directly enables investments in low-carbon technology and operational improvements that reduce emissions.
- 2. Partnerships for global circularity.** The Group entered a strategic partnership with Mitsubishi Materials, supporting the development of a global circular-economy network and facilitating investment in advanced recycling technologies.
- 3. Integration of energy-efficiency measures.** Elemental Group systematically worked to reduce energy consumption, expanded the share of green electricity, and applied energy-efficient technologies across its recycling operations to minimise emissions and environmental impact. These measures align with the Group's mission to produce "green metals" using low-emission, high-efficiency processes.

In addition, the Group plans to conduct a comprehensive climate-risk assessment in 2026 to further integrate climate considerations into strategic decision-making and operational planning.



E1-4 Targets related to climate change mitigation and adaptation

Elemental Group has calculated its Scope 1, Scope 2 and selected material categories of Scope 3 greenhouse gas emissions for the past two financial years, following the Greenhouse Gas (GHG) Protocol methodology.

Through its operations in waste recycling and the recovery of secondary raw materials, the Group contributes to emissions reduction by diverting waste from landfill, reducing the demand for carbon-intensive primary resource extraction. Established targets will further strengthen the Group’s contribution to climate change mitigation across its value chain:

2025 (baseline)	Unit	Target
0.04	tCO ₂ e/t	Reduce Scope 1+2 GHG emissions (market-based) by 30% by 2030 per ton of processed waste
80.4	%	Achieve 100 % use of electricity from renewable sources by 2030
0.16	MWh/t	Improve energy efficiency 10% by 2030 per ton of processed waste

The Group’s GHG emission reduction targets are based on internal operational analysis and identified efficiency opportunities. The targets have not been validated as science-based, are not derived from a sectoral decarbonisation pathway. In setting the targets, the Group considered expected developments in production volumes, energy use, regulatory requirements and technological improvements. Emission reductions are expected to be achieved primarily through energy efficiency improvements, increased use of renewable electricity, optimisation of transport activities and gradual modernisation of equipment.



E1-5 Energy consumption and mix

Elemental Group continuously improves its energy efficiency and optimizes the use of different energy sources across its facilities. The Group aims to reduce overall energy consumption, increase the share of renewable and low-carbon electricity, and minimize the use of fossil-fuel-based energy. In its recycling operations, the Group relies primarily on electricity for technological processes and heat supply, using advanced energy-efficient equipment to lower consumption. Efforts are also made to reduce fuel use in logistics and internal transport by improving route planning and gradually transitioning to cleaner vehicle technologies. The Group is expanding the use of certified green electricity in its sites and exploring opportunities to integrate renewable energy sources into processing facilities, supporting lower operational. Energy consumption and mix are presented in the following table.

Energy consumption and mix	Unit	2025
(1) Fuel consumption from coal and coal products	MWh	N/A
(2) Fuel consumption from crude oil and petroleum products	MWh	29 779
(3) Fuel consumption from natural gas	MWh	6 868
(4) Fuel consumption from other fossil sources	MWh	N/A
(5) Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources	MWh	5 378
(6) Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	36 790
Share of fossil sources in total energy consumption	%	N/A
(7) Consumption from nuclear sources	MWh	N/A
Share of consumption from nuclear sources in total energy consumption	%	N/A
(8) Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	N/A
(9) Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	12 968
(10) The consumption of self-generated non-fuel renewable energy	MWh	8 620
(11) Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	21 588
Share of renewable sources in total energy consumption	%	37
(12) Total energy consumption (calculated as the sum of lines 6, 7 and 11)	MWh	58 378

Energy intensity per net revenue	2025
Total energy consumption from activities in high climate impact sectors per net revenue from activities in high climate impact sectors (MWh/keUR)	0,03

The Group's revenue is generated from Waste Management which is classified as high climate impact sector.



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

GHG emissions metrics	Unit	2025
Scope 1 GHG emissions		
Gross Scope 1 GHG emissions	tCO₂eq	9 068
Percentage of Scope 1 GHG emissions from regulated emission trading schemes	%	0
Scope 2 GHG emissions		
Gross location-based Scope 2 GHG emissions	tCO₂eq	10 027
Gross market-based Scope 2 GHG emissions	tCO ₂ eq	2 047
Scope 3 GHG emissions		
Total Gross indirect (Scope 3) GHG emissions	tCO₂eq	120 240
1 Purchased goods and services	tCO ₂ eq	21 048
2 Capital goods	tCO ₂ eq	14 463
3 Fuel and energy-related activities (not included in Scope 1 or Scope 2)	tCO ₂ eq	2 485
4 Upstream transportation and distribution	tCO ₂ eq	7 261
5 Waste generated in operations	tCO ₂ eq	1 051
6 Business travels	tCO ₂ eq	550
7 Employee commuting	tCO ₂ eq	1 712
8 Upstream leased assets	tCO ₂ eq	N/A
9 Downstream transportations	tCO ₂ eq	4 193
10 Processing of sold products	tCO ₂ eq	65 450
11 Use of sold products	tCO ₂ eq	N/A
12 End-of-life treatment of sold products	tCO ₂ eq	2 026
13 Downstream leased assets	tCO ₂ eq	N/A
14 Franchises	tCO ₂ eq	N/A
Total GHG emissions		
Total GHG emissions (location-based)	tCO₂eq	139 336
Total GHG emissions (market-based)	tCO₂eq	131 355
Out of Scope	tCO₂eq	391

GHG intensity per net revenue	2025
Total GHG emissions (location-based) per net revenue (tCO ₂ eq/kEUR)	0,13
Total GHG emissions (market-based) per net revenue (tCO ₂ eq/kEUR)	0,12

GHG intensity per 1 ton of treated waste	2025
Total GHG emissions (location-based) per tons (tCO ₂ eq/tons)	0,59
Total GHG emissions (market-based) per tons (tCO ₂ eq/tons)	0,56

The Group's GHG emissions are predominantly driven by Scope 3 emissions, both on a location-based and market-based basis.

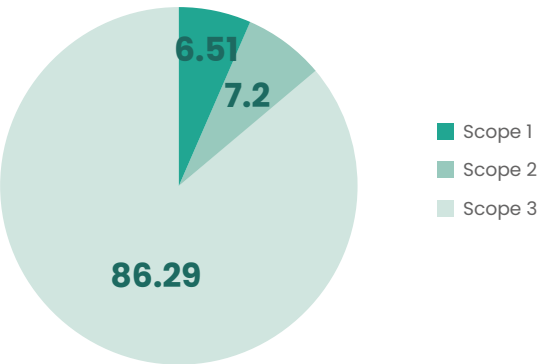
On a location-based approach, Scope 3 emissions account for 86.29% of total GHG emissions, while Scope 2 represents 7.20% and Scope 1 accounts for 6.51%. This distribution reflects the significant contribution of value chain activities compared to direct and energy-related emissions from the Group's own operations.

On a market-based approach, the share of Scope 3 emissions increases to 91.54%, while Scope 2 decreases to 1.56%, reflecting the impact of market-based electricity instruments. Scope 1 emissions remain similar 6.90%.

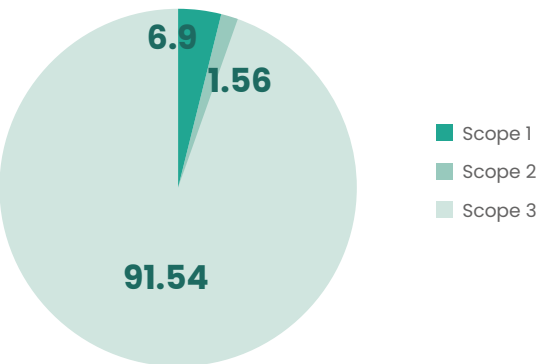


Overall, the emissions profile demonstrates that the Group’s climate impact is largely associated with indirect emissions arising from the value chain, while direct emissions from owned or controlled sources represent a smaller proportion of total emissions.

Total GHG emissions (location based), %



Total GHG emissions (market based), %

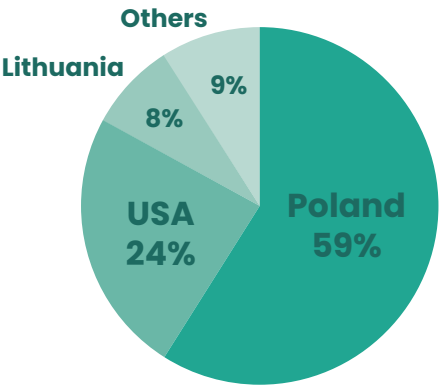


The Group’s GHG emissions are mainly generated by a small number of key subsidiaries carrying out energy-intensive recycling and processing activities. The largest contributors are Syntom Metal Recycling sp. z o.o., Terra Recycling sp. z o.o. and Tesla Recycling sp. z o.o., EMP recycling UAB, PGM of Texas LLC, Colt Recycling LLC, Elemental Strategic Metals, which together account for a significant share of total emissions (~68%).

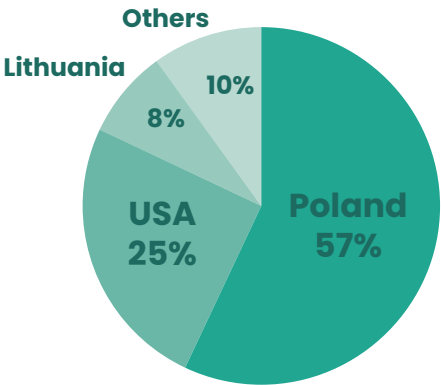
Most other subsidiaries contribute relatively smaller amounts of emissions. In general, emissions calculated on a location-based approach are higher than market-based emissions, reflecting differences in electricity sourcing.

More than half of the Group’s GHG emissions are concentrated in Poland, with significant contributions from the United States and Lithuania.

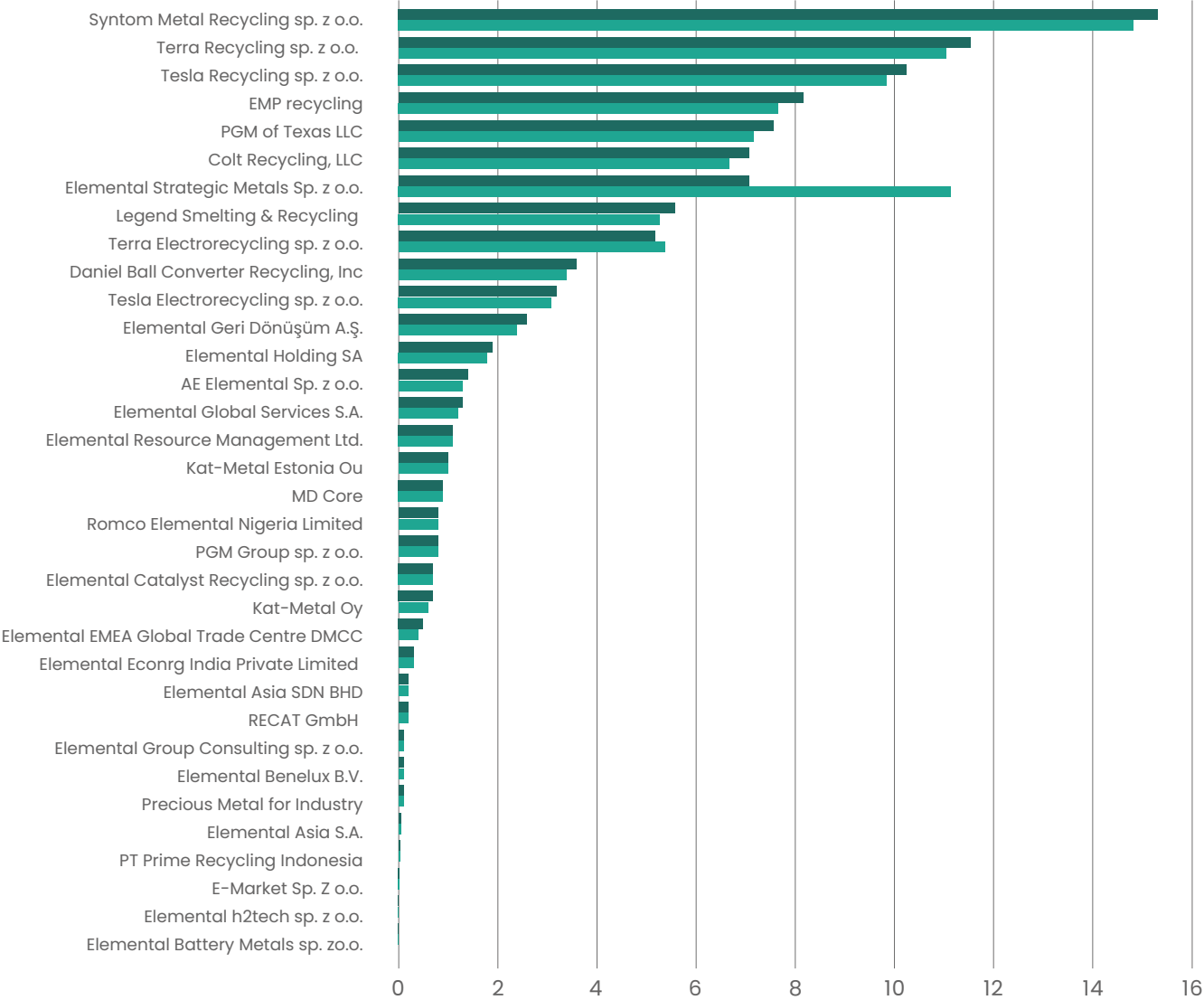
Total GHG emissions by country (location based), %



Total GHG emissions by country (market based), %



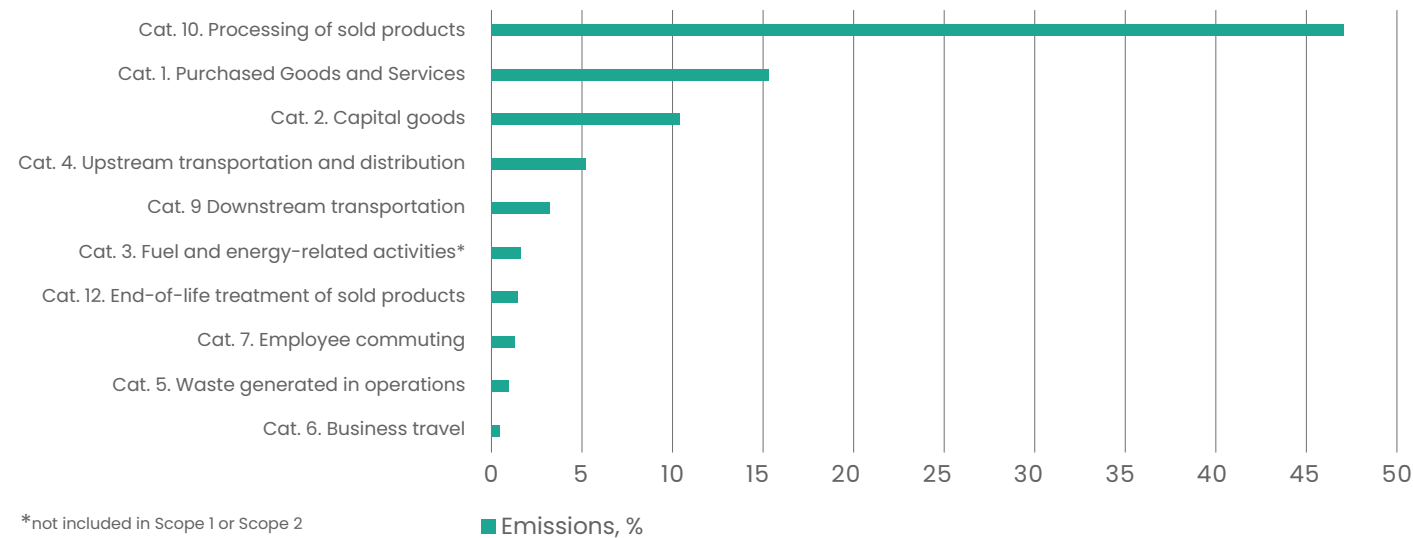
Total GHG emissions by subsidiary, %



The majority of Scope 3 emissions arise from a limited number of key value chain activities.

The most significant source is Category 10 – Processing of sold products, accounting for 65,450 tCO₂e (47%) of Scope 3 emissions. Other major contributors include Purchased goods and services (Category 1) with 21,048 tCO₂e (15%) and Capital goods (Category 2) with 14,463 tCO₂e (10%). Together, these categories represent the largest share of the Group’s Scope 3 emissions, highlighting the importance of upstream procurement and downstream processing activities in the Group’s overall climate impact.

Total GHG emissions by category, %



GHG emissions calculation guidance

General Provisions

The Elemental Group’s carbon footprint calculations are based on the Greenhouse Gas (GHG) Protocol and are consistent with the ESRS requirements. Specifically, the calculations follow the GHG Protocol Corporate Accounting and Reporting Standard and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard. Emissions are calculated across the entire value chain in accordance with these standards.

Emission factors used in the calculations are derived from research-based Life Cycle Analyses (LCAs) sourced from CEDA by Watershed, the UK Department for Environment, Food & Rural Affairs (DEFRA), and other recognized and reliable emission factor databases.

The operational control approach is applied to define organizational boundaries. The reported data covers the majority of the Group’s operational activities; however, certain entities are excluded where operations are non-operational, immaterial, or data is not available. Data collection and consolidation processes are continuously being improved. Reporting covers direct GHG emissions (Scope 1) from the Group’s own operations, indirect GHG emissions from purchased energy (Scope 2), and other indirect GHG emissions (Scope 3) occurring across the value chain, including both upstream and downstream activities.

The calculation includes greenhouse gases such as CO₂, CH₄, N₂O, HFCs, PFCs, SF₆ and NF₃, which are converted into CO₂ equivalents (CO₂eq).

Scope 1 emissions have been calculated from the fuels used by production units. Emissions are calculated primarily using DEFRA emission factors, supplemented by other publicly available and recognized sources. Refrigerant’s emissions are included in the calculation. The Group is not subject to regulated emission trading schemes. Therefore, 0% of Scope 1 emissions fall under ETS.

Two different methods are used for **Scope 2** emissions assessment. The market-based method uses supplier-specific emissions factors, supplemented with national residual mix emission factors for untracked purchased electricity. In the location-based method, country-specific average emission factors for electricity are used. The residual mix factors and country-specific factors have been obtained from the Carbon Footprint Ltd report on emission factors. The use of emission factors always involves uncertainty because they are based on averages that do not necessarily reflect the characteristics of the activities or context in question. Scope 2 includes market instruments, such as the trading of Guarantees of Origin for electricity.

The materiality of each of the 15 **Scope 3** categories is determined using a spend-based materiality assessment. All categories assessed to be material to at least one of the Group's business areas are calculated. Categories in which the amount of greenhouse gases was insignificant are also included in the Scope 3 inventory. The categories included in the calculation are listed in the table on GHG emissions. Not all the Group's companies are included in the calculation, as some of them are non-operational, do not perform any waste management activities, or function solely as holding entities. In several cases, the companies' operational scale are minimal. The data presented may not be fully comprehensive, as some companies within the Group did not provide the full set of requested data. Due to the Group's global operations, the process of collecting and consolidating data across all entities is continuously improving.

Scope 3 emissions include fossil emissions from other sources across the upstream and downstream value chain of all production units. The Scope 3 emissions inventory is divided into 15 subcategories (C1–C15):

- C1 and C2 are calculated using spend data multiplied by relevant spend-category-specific emission factors. This approach introduces uncertainty as it relies on financial proxies rather than physical data. Differences in currency and economic structures across countries further affect accuracy. C1 includes emissions related to the production of raw materials and services purchased by the organization. Emission factors are primarily based on 2025 CEDA by Watershed datasets. For purchased waste, an emission factor of 0 was assumed.
- C3 Well-to-Tank emissions are calculated based on actual energy consumption multiplied by the relevant emission factors.
- C4 includes third-party transportation and distribution paid for by the organization. The obtained tonne-kilometres (tkm) were multiplied by appropriate emission factors from the DEFRA database, taking into account the relevant type of transport.
- C5 is calculated based on actual waste data multiplied by the relevant emission factors. Waste quantities were multiplied by dedicated emission factor from the DEFRA database.
- C6 emissions are calculated based on mileage allowances for employee travel and multiplied by the appropriate emission factors from the DEFRA database.
- C7 Employee commuting is calculated based on estimates of the distance travelled by employees and the type of transport used (e.g. car or train). The calculations also include emissions generated from remote working.
- C8 is included in Scope 1 and Scope 2 emissions, where applicable.
- C9 includes third-party transportation and distribution after sale where the customer pays for freight. Emissions are calculated by multiplying the number of tonne-kilometres by the relevant emission factors from the DEFRA database.
- C10 relates to intermediate products that require further processing, transformation, or incorporation into another product before use by the end user.
- C12 includes emissions related to the handling and disposal of sold products after their use has ended. For all sold products, a typical waste disposal method was assumed.

The subcategories C11, C13, C14, and C15 are not relevant for the Group. Out-of-scope (biogenic) emissions outside of Scope 1 include CO₂ emissions from the combustion of biofuel. The metrics have not been validated by an external party.

In 2025, the Group reviewed and updated its GHG accounting methodology to improve the accuracy of emissions assessment, including updating emission factor sources and obtaining more precise activity data. As a result, the 2025 emissions are not directly comparable with those reported in previous years. In addition, structural changes within the Group further limit year-on-year comparability, as several companies were divested while new entities were acquired and integrated. Some Group companies operated only partially in 2024 but significantly increased their activity levels in 2025. These changes in the Group's composition and operational scale also affect total reported emissions and reduce comparability between reporting periods.



ESRS E2 Pollution

ESRS 2 IRO-1-E2 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities

Pollution-related impacts, risks and opportunities were identified as part of the Group’s double materiality assessment. The assessment was based on internal operational data, environmental monitoring, compliance reviews and incident records, with a focus on air emissions from own operations, recycling processes, transport activities and battery handling, as well as pollution impacts occurring upstream and downstream in the value chain.

The identification and assessment of pollution-related impacts were supported by internal consultations involving relevant operational, environmental and management functions, as well as by questionnaires addressed to employees and external stakeholders. Employees and external stakeholders were invited to assess the significance of environmental impacts, including air pollution and pollution prevention, and to identify negative environmental impacts arising from the Group’s operations. The

consultations provided qualitative input into the assessment of pollution-related impacts in own operations.

In the following table is a description of the Group’s material impacts and risks related to pollution. The identified IROs relate primarily to air pollution arising from the Group’s own operations, including transport activities, recycling processes and battery handling.

Sub-Topic	Value chain location	Detailed description	Impact / Risk	Status	Time horizon
Pollution of air	Own operations	Elemental Group’s activities, including transportation and industrial processes, emit air pollutants (e.g. NOx, SOx, particulate matter). Elemental Group recognizes the importance of addressing air emissions, with the primary sources being transportation and industrial activities. While efforts have been made to reduce these emissions, such as using Euro 6 compliant vehicles, there remains room for improvement. Transitioning more of the vehicle fleet to electric or hybrid models and enhancing emission controls in industrial processes are key strategies that could significantly improve local air quality and reduce environmental impact.	Negative impact	Actual	short, medium, long term
Pollution of air	Upstream, Downstream	Group value chain upstream activities, such as electronics manufacturing, batteries manufacturing and downstream activities, such as copper production, manufacture of basic iron and steel emit a lot of air pollution released during processes like soldering, cleaning, and the use of high-temperature ovens	Negative impact	Actual	short, medium, long term
Pollution of air	Upstream	Storage of batteries carries the risk of fires, which can lead to the emission of toxic gases and fine particles that degrade air quality. Despite being stored in special containers, fires can occur due to electrical short circuits, mechanical damage, or improper segregation of different types of batteries, which can lead to uncontrolled chemical reactions.	Negative impact	Actual	short, medium, long term
Pollution of air	Own operations	Emissions from recycling machinery contribute to air pollution, potentially affecting air quality and the health of nearby communities. These emissions can include particulate matter, volatile organic compounds, and other pollutants that may have adverse effects on respiratory health and the environment.	Negative impact	Actual	short, medium, long term
Pollution of air	Upstream, Own operations	The storage of batteries poses a significant fire risk, potentially resulting in the emission of toxic gases and fine particles that degrade air quality. Although batteries are stored in specialized containers, fires can still occur due to factors such as electrical short circuits, mechanical damage, or improper segregation of different battery types. These incidents can lead to uncontrolled chemical reactions, posing safety hazards to personnel and surrounding communities, and potentially causing environmental damage. Effective risk management strategies, including rigorous safety protocols and regular inspections, are crucial to mitigate these risks and ensure safe storage practices. Such events could lead to increased regulatory scrutiny, high remediation costs, potential financial liabilities, and damage to the group’s reputation.	Risk	-	short, medium, long term

E2-1 Policies related to pollution

Elemental Group conducts its operations in accordance with applicable regional and local environmental legislation in all countries where the Group operates, including regulations governing pollution prevention, control, and the reduction of environmental impacts. At the same time, the Group recognises that its activities may have a significant effect on the environment and has therefore established an Environmental Management Strategy. Additionally, the Group have a Supplier Code of Ethics, which define environmental and pollution-prevention requirements for suppliers and business partners. The Group does not have a policy dedicated specifically to air pollution. Based on the insights from the Double Materiality Assessment, the Group plans to review and update its Environmental Management Strategy in 2026 to ensure it remains aligned with evolving priorities and stakeholder expectations.

E2-2 Actions and resources related to pollution

Across its global operations, Elemental Group implements a range of pollution-related actions focused on preventing, monitoring and mitigating environmental impacts. The Group evaluates local environmental conditions at each site – covering air, water and soil pollution risks, noise, waste generation and resource use – and integrates these considerations into operational planning and decision-making. Group companies apply various air pollution reduction measures at its processing facilities, including emission control equipment, dust capture and filtration systems, and other technologies designed to minimise atmospheric emissions during recycling operations.

E2-3 Targets related to pollution

Specific targets for air pollutants have not yet been defined at Group level, air-emission-reduction measures are regularly monitored at plant level. The Group plans to assess the need for dedicated air-pollution targets in the coming years. In addition, the Group plans to complete a comprehensive

inventory of all air, water and soil pollution sources and publish verified pollutant-emission data.

E2-4 Pollution of air, water and soil

In major Group recycling facilities, operations are regulated by permits issued by the competent authorities. At present, the Group discloses only partial data on air, water and soil pollution, as the inventory and monitoring of pollution sources has not yet been carried out across all the Group's operational pollution sources. For this reason, it is not yet possible to fully assess the Group's environmental impact in accordance with the criteria set out in Annex II of Regulation (EC) No. 166/2006. The Group is committed to ensuring comprehensive identification of air, water and soil pollution sources, as well as disclosure of emitted pollutants, by 2028 to enhance transparency and environmental accountability.

During our operations, air pollutants are inevitably generated. Across the Group's waste management facilities worldwide, we continuously monitor and manage these emissions to minimize environmental impacts and ensure compliance with applicable regulations.

In line with our environmental objectives, major facilities conduct regular air-emissions monitoring. We also implement a range of measures to reduce the release of pollutants into the atmosphere, including the use of air-filtration systems and maintaining operational areas in a manner that limits fugitive dust and particulate emissions. These facilities maintain air-emission inventories and prepare emissions reports in accordance with local regulatory requirements. In 2025, no cases of non-compliance with air-emissions requirements were identified.

Air pollution metrics, tons	2025
Carbon dioxide	29,568
Nitrogen oxides	6,137
Particulate matter	1,049
Sulphur oxides	1,000
Chlorine and inorganic compounds	0,942
Carbon monoxide	0,763
Aromatic hydrocarbons	0,145
Ammonia	0,073
Fluorides	0,040
Chromium and compounds	0,0002
Lead and compounds	0,0004
Chlorides	0,007
Aliphatic hydrocarbons	0,007
Total organic carbon	0,006
Hydrogen chloride	0,002
Iron and compounds	0,002
Sulfuric acid	0,0008
Nitric acid	0,0006
Manganese oxides	0,0001
Thallium	0,00009

ESRS E5 Circular economy and resources

ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

The Group screened its assets and activities as part of its double materiality assessment to identify actual and potential impacts, risks and opportunities related to resource use and circular economy, with a focus on resource inflows, resource outflows related to products and services, and waste generated by its own operations. The screening was based on internal operational data, material flow information, waste management data, and compliance documentation. Impacts occurring upstream and downstream in the value chain were identified through internal analysis of business activities and processes.

The identification and assessment of resource use and circular economy-related impacts were supported by internal consultations involving relevant operational, environmental and management functions. In addition, questionnaires addressed to employees and external stakeholders included questions on waste management, material recycling and resource efficiency, and invited respondents to identify negative environmental impacts arising from the Group’s operations. The consultations provided qualitative input to the assessment of resource use and waste-related impacts in own operations.

In the table below is a description of the Group’s material impacts, risks and opportunities related to resource use, circular economy and waste. The identified IROs mainly reflect the Group’s circular business model, including positive impacts related to recycling, material recovery and waste reduction, as well as risks and opportunities linked to residual and hazardous waste management.

Sub-Topic	Value chain location	Detailed description	Impact/ Risk	Status	Time horizon
Resources inflows, including resource use	Own operations	Thanks to its business profile focused on the circular economy, the group has a significant positive impact on the environment. Most of the used elements are recycled, reused and recovered, which significantly reduces the amount of waste destined for final disposal. This approach limits the need for sourcing new raw materials and supports sustainable resource management.	Positive impact	Actual	short, medium, long term
Resource outflows related to products and services	Own operations	The group's processes enable the transformation of waste into products or semi-products, effectively making waste both the starting and ending points of the technological processing cycle. For non-ferrous waste, including materials such as aluminium, copper, zinc, and brass, as well as ferrous metals, the end products often shed their waste status. This transition positively impacts the environment by reducing waste and fostering a circular economy. The status of the sold "product" is customized to meet customer expectations, thereby increasing its market value.	Positive impact	Actual	short, medium, long term
Resource outflows related to products and services	Own operations	One of the key opportunities for Elemental Group in managing resource outflows is the development and implementation of innovative strategic partnerships with technology companies and research institutions. Such partnerships can be a source of new technological solutions that enable more efficient processing and recovery of materials, especially those that are difficult to recycle. Collaborative research and development projects can lead to the development of advanced methods and technologies that reduce the amount of waste sent to landfills and increase the recovery rate of valuable materials. This approach not only strengthens Elemental Group's position as an innovation leader in the recycling industry but also provides a competitive advantage, contributing to a more sustainable economic model.	Opportunity	-	short, medium, long term

Sub-Topic	Value chain location	Detailed description	Impact/ Risk	Status	Time horizon
Waste	Own operations	Elemental Group's recycling initiatives significantly contribute to environmental sustainability by treating electronic waste, automotive catalysts waste, ferrous and non-ferrous metals waste and all kind of batteries waste as a valuable resource. By recovering materials such as precious metals such as gold, silver, platinum, other metals such as and copper, aluminium, as well as critical materials lithium, cobalt and nickel and other materials such as glass, plastics for many different sectors, the group not only reduces e-waste in landfills but also supports vital industries. Across all recycling activities, Elemental Group emphasizes the circular economy by ensuring that recovered materials are reintegrated into production cycles. This approach supports the reduction of waste, promotes resource efficiency, and contributes to lowering the carbon footprint of manufacturing processes.	Positive impact	Actual	short, medium, long term
Waste	Own operations	Despite the recycling efforts, the waste generated from these operations can have a significant negative impact. While recycling aims to minimize waste, there remains a portion of waste that cannot be further processed or reused. This residual waste is often sent to landfills or incinerated, sometimes with energy recovery, but still contributes to environmental degradation. The disposal of non-recyclable waste in landfills can lead to soil and water contamination, while incineration processes may release harmful emissions into the atmosphere.	Negative impact	Actual	short, medium, long term
Waste	Own operations	Uncontrolled and improperly managed cases of hazardous waste treatment due to inadequate specialized processing and lack of high-precision technologies may negatively affect environmental safety, leading to increased pollution and ecological degradation. Consequently, the Group may face significant costs related to enhanced operational expenses and potential regulatory penalties. Additionally, such inefficiencies can harm the company's reputation, affecting the trust of stakeholders and business partners, complicating the achievement of strategic goals, and weakening long-term business relationships.	Risk	-	short, medium, long term
Waste	Own operations	Elemental Group has the opportunity to significantly enhance its role in the circular economy by focusing on efficient waste management. One of the key opportunities is the development and implementation of advanced recycling technologies, which can increase the speed and effectiveness of waste processing while reducing the amount sent to landfills. This enables the company to contribute to reducing the negative environmental impact while generating economic value from recovered materials. Moreover, investing in research and development of new waste processing methods, including the recycling of hard-to-process materials, can provide Elemental Group with a competitive advantage. Developing partnerships with other entities in the recycling value chain, such as companies involved in waste collection and segregation, can also aid in optimizing processes and reducing costs.	Opportunity	-	short, medium, long term

E5-1 Policies related to resource use and circular economy

Elemental Group plays a direct and essential role in the circular economy by converting waste streams into high-quality secondary raw materials used in new production processes. Through the recovery of valuable materials, the Group extends the lifecycle of resources, reduces the need for primary extraction, and contributes to more efficient and responsible resource use across global value chains. Reducing the amount of waste generated in the Group's operations and ensuring its responsible management is one

of the Group's environmental priorities. These principles are embedded in the Group's ESG Strategy and its Environmental Management Strategy, which outline commitments to resource efficiency, waste reduction, and the development of innovative recycling technologies.

Resource-use and waste-management practices are further supported by site-level environmental policies, including those implemented at ISO

14001-compliant facilities. These policies address local resource consumption, promote the reduction of raw material and energy use, and ensure that environmental impacts are continuously monitored and minimised. Together, these measures reinforce the Group's ambition to operate sustainably and strengthen circular-resource loops across all regions where it operates.

E5-2 Actions and resources in relation to resource use and circular economy

Elemental Group implements various actions to use resources more efficiently and improve circularity across its operations. By optimising recycling processes and increasing the recovery of secondary raw materials, the Group reduces the need for primary resources and supports more sustainable production cycles. In addition, although the Group's core business is waste recycling, increasing attention is being given to reuse by identifying valuable items within waste streams and giving them a second life whenever possible. To further strengthen circularity, the Group continues to:

- Expand its waste-collection network across key markets — Europe, the United States, the Middle East, and Asia — increasing access to secondary raw materials.
- Invest in new and more efficient recycling facilities, improving secondary-material recovery and reducing the amount of waste sent to landfill.
- Strengthen battery-metal recycling capacity by advancing the EU-supported Li-ion battery recycling plant in Zawiercie.
- Scale up platinum-group metal (PGM) recovery by expanding processing capabilities for critical metals such as platinum, palladium, and rhodium – essential for renewable-energy – while lowering emissions associated with primary extraction.
- Develop global circularity partnerships, including a strategic partnership with Mitsubishi Materials, supporting the growth of a global circular-economy network and encouraging investment in advanced recycling technologies.

In 2025 the POLVOLT Project was started to develop – which holds exceptional importance for the Group's future. POLVOLT is Elemental Group's flagship industrial investment designed to create one of Europe's most advanced hubs for the recovery and refining of strategic metals from electronic scrap and spent batteries.

The project integrates two complementary industrial platforms:

- large-scale copper and precious metals smelting and refining based on electronic scrap and copper-bearing materials,
- advanced refining of battery black mass to recover lithium, nickel and cobalt.

With a planned investment of approximately USD 800 million and significant public grant support, POLVOLT addresses Europe's structural need for secure, local and circular sources of critical raw materials for electrification, renewable energy, digital infrastructure and advanced manufacturing.

The project is developed in phases, with an initial focus on copper and electronic scrap – a mature, liquid and structurally undersupplied market followed by the selective and disciplined expansion into battery metals refining once market volumes, technology readiness and competitive conditions are fully confirmed.

POLVOLT builds on Elemental's long-standing industrial expertise, its network of more than 100 sourcing locations worldwide and its position as one of the largest independent collectors and processors of complex metal-bearing waste in Central and Eastern Europe.

Two strategic pillars of POLVOLT:

1. COPPER & E-SCRAP METALS PROJECT

The copper platform represents the dominant and first development phase of the POLVOLT project. With an estimated capital expenditure of approximately USD 800 million for the final phase, including a dedicated smelter and refinery, this platform will focus on the processing of copper-bearing materials and complex electronic scrap, recovering:

- high-purity copper,
- precious metals – primarily silver and gold,
- selected rare and specialty metals from printed circuit boards and electronic components.

The copper platform will absorb approximately two thirds of the total investment budget and is supported by EUR 400 million in public grants awarded over a seven-year period.

For the first three to four years, development will concentrate exclusively on copper and electronic scrap, markets where Elemental already holds a leading independent position and where demand dynamics are structurally strong and highly liquid.

Elemental is currently evaluating the final product form, including copper anodes, cathodes or copper powder, to best match long-term offtake agreements and partner requirements.

A strategic technology and industrial partner is being selected to acquire a 33%–49% equity stake and contribute proven know-how in the design, construction and operation of large-scale copper smelting and refining facilities.

POLVOLT will not compete directly with primary copper producers in volume. Instead, it will focus on:

- smaller, high-margin production streams,
- fully secured offtake structures,
- long-term contracts aligned with equity participation.

Demand for copper and associated metals is structurally rising, driven by:

- electrification of transport,
- renewable energy infrastructure,
- large-scale data centers and AI-driven digitalization.

The project benefits from strong long-term macroeconomic fundamentals and from a market environment in which demand for secured copper supply significantly exceeds available production.

2. BATTERY METALS REFINING PROJECT

The battery metals platform represents the second strategic pillar of POLVOLT and will be developed in a disciplined, selective and market-driven manner. The project targets the refining of battery black mass into:

- lithium compounds,
- nickel and cobalt intermediates,
- selected battery-grade materials for cathode and precursor production.

Unlike copper and electronic scrap, battery metals refining is a technologically complex and highly competitive market, currently dominated by Asian – in particular Chinese – players with significant scale advantages and overcapacity.

Elemental approach is therefore deliberately conservative and phased. Before committing to large-scale capital expenditure, three conditions must be met:

- confirmed and sustainable volumes of black mass available in Europe,
- access to best-in-class and future-proof refining technology,
- a competitive cost position versus established Asian refiners.

The project will enter its formal design and partner selection phase approximately 2–3 years after the start of the copper platform, when the first large wave of end-of-life electric vehicle batteries is expected to reach the European recycling market. The current European battery recycling market is characterized by:

- limited volumes of end-of-life batteries,
- excess processing capacity,

- multiple postponed or cancelled projects following recent bankruptcies and write-downs.
- Most existing black mass production today is still based primarily on manufacturing scrap rather than true end-of-life batteries. Elemental therefore does not intend to rush into large-scale investments ahead of the market. Instead, the company will:
- selectively target niche or partial refining steps,
 - consider lithium-focused extraction streams,
 - avoid direct competition with structurally advantaged Asian incumbents.

E5-3 Targets related to resource use and circular economy

The circular economy model is based on using resources in a way that allows them to be reused, recycled, or transformed into new products. This approach aims not only to reduce waste but also to preserve natural resources.

We participate in the circular economy cycle through our core operations by converting waste into high – quality raw materials for new products, thus ensuring the continuity of resource and product life cycles.

We apply circular economy principles – promoting efficient resource use and waste reduction – not only in waste recycling activities but also across our broader operations.

Elemental Group has set several goals related to how it manages its material inflows and outflows. The focus is on increasing the amount of waste that is brought into the recycling process and maximising the recovery of valuable secondary raw materials. These goals are implemented by applying the Group's recycling model across different countries. These targets are part of the Group's strategy.

2025 (baseline)	Unit	Target
plan	–	Identify the current level of metal recovery and develop a plan to gradually increase the recovery efficiency of valuable and critical metals by 2035
234 843	tons	Expand waste treatment capacity by 20 % by 2030
5 560	tons	Reduce waste sent for final disposal by 10 % by 2035
93,7	%	Achieve a 95% recycling rate by 2030

E5-4 Resource inflows

The main primary materials we use are the waste received for recycling, and our material inflows therefore consist mostly of secondary raw materials. Our activities directly depend on the availability of waste generated in the market. Elemental Group primarily uses both non-hazardous and hazardous waste as its key input materials for recycling, including waste electrical and electronic equipment, ferrous and non-ferrous metal waste, batteries and accumulators, spent automotive catalysts, and other waste streams. None of the raw materials utilised contain any biological substances. In waste-management processes, we also use primary raw materials that serve as auxiliary inputs to ensure the continuity and efficiency of production processes.

The following table shows the metrics for 2025.

Resource inflows	Unit	2025
Overall total weight of products and technical and biological materials used during the reporting period	tons	236 155
Biological materials and biofuels used for non-energy purposes	%	0
Secondary reused or recycled components, secondary intermediary products and secondary materials	tons	235 356
Secondary reused or recycled components, secondary intermediary products and secondary materials	%	99,66



E5-5 Resource outflows

Products and materials

Our material and resource outflows are divided into two categories:

- waste generated from non waste management activities
- waste generated from waste management activities

The waste materials are a combination of all types, including metal, plastic, glass, wood, paper, municipal waste and other.

The Group’s primary resource outflows consist of secondary raw materials recovered from waste streams, including precious metals (such as gold, silver and platinum group metals), non-ferrous metals (including copper, aluminium, zinc and brass), ferrous metals, and selected critical raw materials recovered from batteries and electronic waste. These materials are supplied to smelters, refiners and industrial customers for reintegration into manufacturing processes.

The Group’s production processes are designed to transform waste into marketable materials that re-enter industrial value chains, thereby replacing primary raw material extraction and contributing to the circular economy. Recovered materials are sold as products meeting customer quality specifications.

As the Group produces secondary raw materials rather than finished consumer products, the circular contribution is achieved through maximizing material recovery rates and enabling the recirculation of metals and other materials into new production cycles.

The Group uses packaging primarily for the safe storage and transportation of recovered materials. Packaging materials may include big bags, pallets, plastic boxes, metal barrels or other packaging solutions tailored to the specific recovered material type and handling requirements.

Packaging metrics, t	New packaging	Used packaging	Total
Plastic	47,2	32,5	79,7
recyclable	42,6	32,5	75,1
non-recyclable	4,6	0	4,6
Paper	4	37,5	41,5
recyclable	3,5	35,5	39
non-recyclable	0,5	2	2,5
Metal	405,5	5	410,5
recyclable	405,5	5	410,5
non-recyclable	0	0	0
Wooden	17,4	95,7	113,1
recyclable	17	95,7	112,7
non-recyclable	0,4	0	0,4
Composite	63	1,3	64,3
recyclable	63	1,3	64,3
non-recyclable	0	0	0
Other	267,9	364,3	632,2
recyclable	267,1	343,3	610,4
non-recyclable	0,8	21	21,8
Total recyclable (t)	798,6	513,1	1311,7
Total recyclable (%)	99,2	95,7	97,8



Waste

We are committed to managing waste responsibly, reducing the amount of waste generated and improving recycling rates. Most of the waste within the Group’s operations is generated as a result of waste management processes. The majority of the received waste is recycled or reused, while only a small portion cannot be recovered after treatment due to its composition or technological solutions available and it is therefore sent for incineration or disposal in accordance with applicable regulations. All waste is managed in compliance with legal requirements to ensure that it is processed safely and using the most efficient recycling technologies available. Before any mechanical treatment, all waste is sorted and decontaminated, with hazardous components removed. These procedures are carried out by trained personnel in accordance with established internal processes and other standards. Waste management is regulated and carried out by the local competent authorities, which ensures proper accounting of the reported waste and its classification.

Waste metrics, t	Non-hazardous waste	Hazardous waste	Total
Total waste generated	203 770	31 073	234 843
Total waste diverted from disposal	200 024	29 259	229 283
preparation for reuse	1 053,6	0,6	1 054,2
recycling	189 925,2	29 258,4	219 183,7
other recovery operations	9 044,9	0	9044,9
Total waste directed to disposal	3 746	1 814	5 560
disposal by incineration	2 562,8	179	2 741,8
disposal by other disposal operations	1 183,3	1 634,7	2 818
Amount of non-recycled waste (t)	12 791	1 814	14 605
Amount of non-recycled waste (%)	6,27	5,84	6,21

* Methodologies. Waste data collected and reported on a monthly basis by those responsible for collecting data. Each site measures waste directly by weighing it on-site.

Please note that the total waste generated will not match the sum of total waste directed to disposal and total waste diverted from disposal. This difference occurs because certain waste streams received and initially classified as hazardous become non-hazardous after hazardous components are safely removed and neutralised. As a result, the mass of waste changes during treatment. Additionally, in some years the amount of waste treated exceeds the amount of waste received due to the processing of materials accumulated from previous periods.



Composition of waste

Waste stream	Materials
Waste Electrical & Electronic Equipment	Plastics, glass, metals, wood, paper, textile, rare metals, concrete, oil, freons
Printed circuit boards	Copper, fiberglass, resins, gold, silver, palladium, tin, lead, various electronic components
Spent Automotive Catalysts	Platinum, palladium, rhodium (PGMs), ceramic substrate (cordierite), stainless steel (iron, chromium, nickel)
Non-ferrous metals	Aluminium, copper, brass (copper-zinc), bronze (copper-tin), lead, zinc
Ferrous metals	Iron, carbon steel, stainless steel
Batteries and accumulators	Lithium, nickel, cobalt, manganese, graphite, aluminium, copper, electrolytes (organic carbonates, lithium salts), steel.
Other Waste	Plastics, glass, paper, wood, paper, ceramics, depending on the waste type, oil, municipal waste

No radioactive waste is generated in the Group’s operations, as the Group’s companies do not accept such waste for treatment and do not use any radioactive materials in their business activities.



SOCIAL INFORMATION

ESRS S1 Own workforce

ESRS 2 SBM-3-S1 Material impacts, risks and opportunities and their interaction with strategy and business model

All people in the Group’s own workforce who can be materially impacted by its activities are included in the scope of this disclosure. The identified material impacts, risks and opportunities relate to the Group’s own operations, in particular organisation and management functions, recycling operational processes and sales activities.

The material impacts identified relate to employees engaged in own operations, including operational staff working in recycling processes and

employees performing organisational, management and sales activities. No material impacts on self-employed workers or workers provided by third-party employment agencies were identified in the assessment.

In the following table is a description of the Group’s material impacts and risks related to its own workforce. The identified IROs relate primarily to working conditions, in particular occupational health and safety, as well as risks associated with adequate wages.



Sub / sub-sub-topic	Detailed description	Impact/ Risk	Status	Time horizon
Working conditions – Health and safety	Employees’ exposure to hazardous substances during the production process poses significant health risks, potentially leading to serious health issues. This endangers the well-being of the workforce.	Negative impact	Actual	short, medium, long term
Working conditions – Health and safety	Employees experience accidents due to Mechanical hazards when working in productions units – injury from sharp objects (glass, sharp objects, etc.), injury when working with tools and equipment, being injured by vehicles (forklifts, trucks).	Negative impact	Actual	short, medium, long term
Working conditions – Health and safety	Ineffective management of the health and safety of workers can lead to a higher incidence of workplace accidents and injuries, resulting in significant legal and financial consequences. This can harm the company’s reputation, reduce employee morale, and increase turnover rates. Additionally, it can cause operational disruptions, leading to downtime and reduced efficiency.	Risk	–	short, medium, long term
Working conditions – Adequate wages	Pay pressure, driven by factors such as rising costs of living, employee expectations, labour market competition, and legislative changes, can significantly impact a company’s financial stability by increasing operational costs and reducing profit margins.	Risk	–	long term

The material negative impacts identified relate primarily to working conditions, in particular occupational health and safety. These include employees' exposure to hazardous substances during production processes and the risk of workplace accidents caused by mechanical hazards, sharp objects, tools, equipment and vehicles. These impacts are connected to daily operational activities and are relevant in the short, medium and long-term.

Material risks arising from impacts on the own workforce include the risk of increased workplace accidents and injuries due to ineffective health and safety management, which may result in legal and financial consequences, reputational damage, higher employee turnover and operational disruptions.

S1-1 Policies related to own workforce

Elemental Group's actions, impacts and risk management related to the company's own workforce are guided by Group's Code of Conduct, Human Resources Management Strategy, Human Resources Management Policy, Occupational Health and Safety Policy, Anti-Mobbing Policy and various guidelines. The principles and policies apply to all business operations in all operating countries.

Human rights

Economic activities are carried out in compliance with minimum safeguards laid down of Taxonomy regulation Article 18. Group ensures the alignment with the OECD Guidelines for Multinational Enterprises and the UN Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

To implement these principles, the Group has adopted a Human Resources Management Policy aimed at safeguarding employees from child labour, forced labour, and human trafficking. The policy also ensures the right to fair remuneration, rest, equal working conditions, parental leave, and clearly

In addition, long-term financial risks were identified related to pay pressure driven by rising living costs, labour market competition and legislative changes, which may increase operational costs and reduce profit margins. No material opportunities directly arising from impacts or dependencies on the own workforce were identified.

The Group's understanding of people in its own workforce who may be at greater risk of harm was developed through the double materiality assessment, internal operational analysis and an employee survey. The survey invited employees to assess health and safety conditions and to identify negative impacts arising from the Group's operations, providing

regulated working hours. In addition, it affirms employees' rights to decent working conditions, non-discrimination, and respectful treatment.

To ensure effective implementation, the Group has established monitoring mechanisms, including a confidential Whistleblowing Channel through which employees can anonymously report potential human rights or ethics violations. All reports are reviewed by qualified specialists, guaranteeing protection against retaliation. Through these measures, the Group maintains a transparent and reliable process for identifying and addressing human rights concerns.

Respect for human rights including labour rights

The Group has adopted an Anti-Mobbing Policy that ensures equal treatment and prohibits discrimination or harassment based on gender, age, nationality, race, ethnic origin, health status, disability, religion, sexual orientation, gender identity, marital status, political beliefs, or social background. The policy reflects the Group's commitment to promoting diversity, inclusion, and equality in all areas of human resources management. The Group upholds key human and labour rights, including safe working conditions, fair treatment, and the right to raise concerns without retaliation. Internal

qualitative input that supported the identification of higher exposure to health and safety risks in operational and recycling-related activities. Employees working in recycling and production environments are exposed to higher health and safety risks due to the nature of their activities, including handling materials, operating machinery and interacting with vehicles and equipment.

The identified material risks related to occupational health and safety apply primarily to employees engaged in operational recycling processes and production-related activities, rather than uniformly to all employees. Risk related to Adequate wages apply across the broader workforce.

grievance mechanisms allow employees to report issues confidentially, and all cases are addressed promptly and impartially.

Employee engagement and participation

The Elemental Group ensures active social dialogue in line with its Human Resources Management Policy. Employees and their representatives are given access to relevant information about the Group's activities and economic situation, and they are consulted on key matters. The Group also applies the Rules for Election and Consultation of Works Councils, ensuring that employee representation and consultation processes are carried out transparently and consistently. This approach helps employees adapt to organizational changes and allows them to meaningfully contribute to decisions that affect their working environment.

Across the Group, employee representation is also ensured in accordance with the legal requirements of each country in which we operate. Depending on local regulations, this may include Works Councils, employee committees, or other formally established representation structures. Regardless of the specific model, the Group is committed to ensuring that employees are appropriately represented and have the opportunity to participate in discussions and decisions related to their working conditions, well-being,

and the workplace environment. This approach strengthens open dialogue between employees and management, fosters mutual trust, and supports the development of an inclusive, collaborative organizational culture. Employee representation is regarded as an essential part of the Group's social responsibility.

Fair wages and motivation

In the Group, employee remuneration is determined in accordance with the internal remuneration system (not publicly disclosed), which is based on the principles of fairness, equity, and proportionality. This system is built on clear standardized procedures that ensure equal treatment of all employees, regardless of their position, department, or personal characteristics, such as gender. In addition to base salary, employees are provided with supplementary social benefits and motivational measures that contribute to their financial well being, professional engagement, and overall job satisfaction. The Group also plans to develop and implement a comprehensive Fair Pay Policy by 2027, further strengthening its commitment to equitable remuneration, transparency, and responsible employment practices across all operations.

Accident prevention

The Group places particular emphasis on ensuring a safe and healthy working environment. To this end, we currently apply an internal procedure for investigating and recording workplace accidents and occupational diseases, which governs the processes of incident investigation, reporting, and assignment of responsibility. All events, including workplace accidents

or incidents occurring on the way to or from work, are investigated with the involvement of responsible specialists and employee representatives. Cases of occupational diseases are determined based on internal regulations that ensure transparency of investigations and the protection of employee rights.

The Group has separate Occupational Health and Safety policy and procedure approved. Our Occupational Health and Safety Policy reflect our commitment to creating and maintaining a safe, healthy and friendly working environment for all employees and associates. As part of our policy, every employee has the right and obligation to report any irregularities and suggestions for improving working conditions. Our goal is not only to meet legal requirements, but also to strive to create a safety culture in which everyone feels responsible for themselves and their colleagues.

Occupational Health and Safety procedure defines the principles, goals and standards adopted in the Group regarding the occupational safety within the Organization, as well as identifies threats, defines the rules for assessing the risk of accidents at work and preventive actions aimed at increasing the level of safety. These rules are adopted in order to unify safety criteria applicable in the Organization, so that, regardless of the place of operation of a given Group Company, conditions of works would be consistent with the best practices, strategies and applicable systems. Achievement of established business goals is always accompanied by care for the safety and health of all employees and collaborators, our customers, suppliers, subcontractors, and other stakeholders. As a professional organization, the Elemental Group has adopted a global-scale principle, without allowing any exceptions, that a high level of safety is an important condition for

sustainable business success, and our employees and collaborators are our greatest asset.

Harassment and violence prevention

The prevention of harassment, violence, and sexual harassment is addressed through the Human Resources Management Policy, which defines unacceptable behaviour and sets mandatory standards of conduct for all employees. This policy prohibits all forms of violence, psychological pressure, and sexual harassment in the workplace and provide protection measures for employees experiencing inappropriate behaviour. The Group ensures access to legal remedies and support, promoting a work environment based on respect, dignity, and cooperation.

Additionally, the Group adopted a Code of Ethics, which outline the core principles of ethical conduct, employee dignity, non-discrimination, and zero tolerance for harassment or violence.

Complaints and violations

The Group operates a Whistleblowing Platform that enables employees to anonymously and safely report potential human rights, ethics, or other workplace-related violations. Reporting of irregularities is defined in the publicly available Whistleblowing Procedure, which sets out the rules for submitting, registering, assessing, and managing reports. All notifications are handled confidentially by designated specialists, and whistleblowers are fully protected against any form of retaliation.

SI-2 Processes for engaging with own workforce and workers' representatives about impacts

The Group engages with its own workforce primarily through employee satisfaction surveys conducted at Group and company level. These surveys gather employees' perspectives on working conditions, occupational health and safety, equality and non-discrimination, remuneration-related matters and organisational changes, and invite employees to identify negative

impacts arising from the Group's operations. Survey-based engagement has been conducted in recent years across several Group companies and forms part of the Group's approach to understanding workforce-related impacts.

The results of employee surveys and double materiality assessment are discussed internally and used to develop decisions according to employees' needs. Workforce perspectives inform decisions related to working conditions, organisational changes, equal opportunities and internal policies, including remuneration analyses and non-discrimination practices. The HR team

consolidates and summarises the results, while the management team makes the final decisions. Organisational changes are communicated in advance in line with internal rules and local regulatory requirements.

Engagement with the own workforce took place during the impact identification and assessment stage of the double materiality assessment carried out at the beginning of 2025. The engagement was conducted through an employee survey designed to collect workforce perspectives on working conditions and workforce-related impacts. The survey was

carried out on a one-off basis in the reporting period as part of the double materiality assessment process.

Coordination of employee engagement activities is overseen by the Group's HR department in collaboration with local HR teams and companies' management. Although the Group does not currently have unified collective agreements or formalised global arrangements for employee consultation on social or human rights matters, it recognises the importance of such dialogue and may expand formal cooperation frameworks where appropriate.

S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns

The Group operates a Whistleblowing Platform that enables employees to anonymously and safely report potential human rights, ethics, or other workplace-related violations. Reporting of irregularities is defined in the publicly available Whistleblowing Procedure, which sets out the rules for

submitting, registering, assessing, and managing reports. All notifications are handled confidentially by designated specialists, and whistleblowers are fully protected against any form of retaliation.



S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Our main health and safety efforts are currently focused on strengthening a risk-based health and safety environment framework, enhancing the capability of our operational systems, and improving critical risk-control measures, while also promoting safety awareness and delivering training for both leadership and frontline employees.

Main group actions:

- **Employee training and competence development.** The Group supports continuous professional and personal development of employees. They participate in Group-funded training programmes, including role-specific courses and general trainings such as occupational safety, environmental skills development, harassment, discrimination, bribery prevention. Training is offered both in-person and online. An annual training plan is prepared, and employees may propose additional trainings.

- **Employee engagement, communication, and community building.** Internal communication is supported through newsletters, the intranet, meetings, and various initiatives that encourage collaboration among employees and integration of new team members. Surveys are also conducted to gather insights on working conditions, well-being, and development needs. Community building is strengthened through team-building activities, celebratory events, professional observances, and other internal initiatives. Employees are encouraged to communicate openly with managers, while regular updates and project presentations help ensure transparency, inclusion, and awareness of Group activities and development.
- **Employee well-being, social benefits.** The Elemental Group offers a wide range of benefits, such as life, personal accident and disability insurance, private medical care, gym passes, employee meals, extra days off. The type of benefits may vary across companies, but all

employees of a given company have equal access to them, regardless of their working time basis.

- **Employee health and safety.** In accordance with national and internal regulations, the Group implements occupational health and safety requirements, including periodic health examinations, OHS trainings, professional risk assessments, and the provision of personal protective equipment. Internal control measures and preventive actions are in place to ensure a safe working environment. A workers' safety committees operate within the Group companies, whose representatives have the right to receive information on OHS matters and organize meetings to discuss employee well being and safety issues.

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Based on the results of the 2025 DMA, Elemental Group has identified the most material own workforce-related impacts, risks and opportunities. The Group has set several outcome oriented and time bound targets to address these areas:

2025 (baseline)	Unit	Target
Plan	-	Expand and develop employee competencies by increasing the share of employees participating in professional development activities to 5 % annually
Plan	-	Develop leadership competencies by ensuring that 60% of managers participate in structured leadership development programmes annually
Plan	-	Define the baseline for employee engagement and develop a plan to continuously improve engagement levels by 2030
Plan	-	Conduct annual wage benchmarking and ensure 100% compliance with fair-pay policy by 2027
Plan	-	Identify the current wage gap and define measurable improvement targets to be achieved by 2027

S1-6 – Characteristics of the undertaking’s employees

Employee characteristics are reported by employment type, gender, contract type and age. All employee figures are reported based on headcount at the end of the reporting period. Employment type includes permanent employees, who are defined as employees with a permanent contract (accounting for local differences in definition). Temporary employees are defined as employees with a temporary contract. Non-guaranteed hours employees include all employees who do not have a guarantee of a minimum or fixed number of working hours. Gender is based on the gender stated by the employee (while respecting local data protection regulations). Employee turnover covers people leaving the organisation, including all employees who have left through voluntary resignations, dismissals, retirement and death during the reporting year. The rate of employee turnover is calculated as the number of employees who have left the organisation during the reporting period divided by the total number of employees at year-end.

Employees by gender	Number of employees (head count)
Male	966
Female	274
Other	-
Not reported	-
Total employees	1240
Average number of employees	1231

The workforce is composed of 78% male employees and 22% female employees. The gender distribution reflects the nature of the Group’s core activities in the waste management sector, which involve a significant share of physically demanding operational and technical roles. These roles are predominantly held by male employees, while female employees are more frequently represented in administrative, managerial, and support functions.

The Group applies equal opportunity principles in recruitment, employment, and career development and does not restrict access to positions based on gender. All roles are filled based on qualifications, skills, and experience, in line with applicable labour regulations and internal policies.

Employee in countries where the undertaking has at least 50 employees representing at least 10% of its total number of employees

Country	Number of employees (head count)
Poland	556
USA	311
Lithuania	197

The Group has a significant presence in three countries of the employees: Poland, United States and Lithuania. Together, these countries account for the majority of the Group’s total workforce (86%).

Employees by contract type & gender	Male	Female	Other	Not disclosed	Total
Number of permanent employees	966	274	-	0	1240
Number of temporary employees	0	0	-	0	0
Number of non-guaranteed hours employees	0	0	-	0	0
Number of full-time employees	966	274	-	0	1240
Number of part-time employees	0	0	-	0	0

Employees by contract type & region	Poland	USA	Lithuania	Total
Number of permanent employees	556	311	197	1064
Number of temporary employees	0	0	0	0
Number of non-guaranteed hours employees	0	0	0	0
Number of full-time employees	556	311	197	1064
Number of part-time employees	0	0	0	0

Employee turnover	2025
Number of employees who have left undertaking	328
Employee turnover rate, %	26



S1-7 – Characteristics of non-employees in the undertaking’s own workforce

Non-employees by gender	Number of non-employees (head count)	Average number of non-employees
Male	127	127
Female	56	56
Other	-	-
Not reported	-	-
Total non-employees	183	183

S1-10 Adequate wages

The Group ensures that all employees receive an adequate wage in line with local minimum wage requirements applicable in each country where we operate. Wage levels are set according to internal remuneration rules and are reviewed regularly to ensure alignment with market conditions and performance-based components.

Based on current assessments across all Group entities worldwide, all employees are paid at or above the applicable national minimum wage and meet the relevant adequate wage benchmarks. No employees in the Group earn below the applicable adequate wage benchmarks.

S1-14 Health and safety metrics

Occupational health and safety are very important in the Elemental Group. Because of the nature of our work, we focus on ensuring the safety of all employees and partners. Every employee in the Group is covered by the occupational health and safety management system, which is based on applicable legal requirements and recognised international standards. This means that 100% of the Group’s workforce falls under an OHS management system. In addition to these requirements, following companies within the Group have implemented and are certified under the ISO 45001 occupational health and safety management standard:

- Colt Recycling
 - Elemental Geri Dönüşüm
 - EMP Recycling
 - Syntom Metal Recycling
- Terra Recycling
 - Terra Electrorecycling
 - Tesla Electorecycling
 - Tesla Recycling



All companies regularly conduct OHS inspections and audits in line with national legislation and international standards. Dedicated OHS officers are appointed to maintain and improve the system, and data on accidents, audits, inspections and corrective actions are reported to the Sustainable Development Department.

Health & safety metrics	2025
Own workforce:	
Workforce covered by health and safety management systems (%)	100
Fatalities (number)	0
Work-related accidents (number)	53
Rate of work-related accidents	21,8
Total number of hours worked by all employees	2 428 743
Work-related ill health of employees (number)	0
Days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to employees	597
Other workers working on undertaking's sites:	
Number of fatalities as result of work-related injuries and work-related ill health	0

In the reporting period, the Group recorded 53 work-related accidents, resulting in a work-related accident rate of 21.8. No fatalities occurred because of work-related injuries or work-related ill health among employees. No cases of work-related ill health reported during the reporting period. The total number of hours worked by all employees during the reporting period amounted to 2 428 743 hours. As a result of work-related accidents and work-related ill health, a total of 597 working days were lost.

S1-17 Incidents, complaints and severe human rights impacts

In 2025, the Group did not receive any reports related to impacts on human rights.



GOVERNANCE INFORMATION

ESRS G1 Business conduct

ESRS 2 GOV-1-G1 The role of the administrative, supervisory and management bodies

The Group’s administrative, management and supervisory bodies oversee business conduct matters, including ethical standards, compliance, integrity and anti-corruption. Their role is embedded in the Group’s governance framework and internal control systems, which are described in the chapter ESRS 2, GOV-2.

The Group’s governance disclosure includes information on the composition of its administrative, management and supervisory bodies as presented in the chapter ESRS 2, GOV-1.

ESRS 2 IRO-1-G1 Description of the processes to identify and assess material impacts, risks and opportunities

In the following table is a description of the Group’s material risks related to business conduct. The identified IROs relate to the management of relationships with suppliers, including payment practices, and to corruption and bribery risks arising from the Group’s own operations and business activities.

Sub-Topic	Value chain location	Detailed description	Impact / Risk	Time horizon
Management of relationships with suppliers including payment practices	Across	Non-compliance with supplier agreements can result in costly legal disputes, financial penalties, damaged supplier relationships, supply chain disruptions, and harm to brand reputation. These consequences can negatively affect the company’s market position, profitability, and ability to secure new business opportunities.	Risk	short, medium, long term
Corruption and bribery - Incidents	Own operations	Corruption incidents risk causing financial and reputational damage, regulatory fines, eroding trust among stakeholders, reducing sales, impacting employee morale.	Risk	short, medium, long term

G1-1 Business conduct policies and corporate culture

The Group's management system is designed to comply with corporate governance principles, legal requirements regulating company management, and international best practices. The Group's organisational culture is built on trust, openness, respect and transparency. These values are consistently strengthened through internal communication, employee education and active engagement.

The Group's governance is grounded in the Group's values, Group Code of Ethics, Supply Chain Management Policy and Supply Chain Code of Conduct. Together, these documents outline the Group's commitment to transparency, fair procurement practices, responsible partner evaluation, compliance with legal and ethical standards, and the continuous improvement of sustainability and risk management processes across the supply chain. All Group companies are required to adhere to fundamental principles and shall not engaged in, support or tolerate:

- the use of torture or other forms of inhuman or degrading treatment;
- forced or compulsory labour, which means work or provision of services that is exacted by any person under the threat of punishment and for which the person concerned has not offered himself voluntarily;
- any form of child labour;
- serious violations of human rights, including abuses such as large-scale sexual violence;
- the direct or indirect support of, benefit from, or involvement in war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide;
- participation in money laundering or financing of terrorism;
- trading in goods originating from unlawful acts (e.g. theft);
- any form of corruption;
- cooperation with entities subject to sanctions or entities based in, or operating in, countries subject to comprehensive international sanctions;
- cooperation with counterparties that fail to apply basic occupational health and safety standards derived from international standards;
- activities that cause significant environmental pollution or contamination, including soil, air or water, or that involve excessive exploitation of natural resources;
- cooperation with entities that do not comply with applicable national laws, including engagement in illegal tax evasion practices;
- cooperation with entities who violate employee rights, including the right to freedom of association, the right to a safe and respectful working environment free from discrimination and harassment, and the right to fair and adequate remuneration.

The Anti-Corruption Policy, together with the Code of Ethics, the Whistleblowing Procedure, the Anti-Mobbing Policy, and other regulations constitute the compliance system. The Group maintains a zero tolerance approach to all forms of corruption, regardless of their scale or nature. All employees, business partners and members of subsidiary boards are required to familiarize themselves with the Policy and adhere to its provisions as a

condition for continued cooperation. Any breach of these rules may lead to disciplinary action, including termination of the contract.

At Elemental Group, we are committed to promptly and seriously addressing concerns, inappropriate conduct, and any non-compliance with applicable laws and regulations. We encourage our internal and external stakeholders to help prevent and detect issues by speaking up when they witness or suspect behavior that violates our Code of Ethics, policies, and procedures. As part of implementing best practices, the Elemental Group has created a system dedicated to report violations. The procedure enables confidential or anonymous reporting. The reporting system is governed by the Group's Whistleblowing Procedure, which specifies how reports are registered, assessed and managed. Information on potential violations can be submitted through the following channels:

- Written correspondence,
- Alert boxes in workplaces,
- E-forms available on the Group's and (or) subsidiaries websites (reporting channel),
- E-mail to a dedicated address.

All information about the Group's reporting channel and how it operates is provided on the website of the Group.

In the Elemental Group, the highest risk of corruption and bribery is linked to commercial functions, as well as to the handling of sensitive information and external relations. In these areas, employees may have access to decisions or data that could be influenced by the risks of improper conduct. These functions is identified as priority risk areas in the anti-corruption policy and in targeted training.



G1-2 Management of relationships with suppliers

The Elemental Group works with suppliers in a transparent and ethical manner, following principles of honesty and responsible business conduct. The Group is committed to complying with antitrust laws and does not tolerate any practices that restrict competition, such as price-fixing, market division or other unfair actions. These standards apply equally to relationships with both suppliers and customers. The Group also places strong emphasis on making payments on time, particularly to small and medium-sized enterprises.

To support responsible cooperation with suppliers, the Group has adopted the Responsible Supply Chain Management and Anti-Money Laundering Policy. It also maintains a transparent supplier approach based on fairness and good market practices. As part of this, the Group carries out a process of identifying and analysing key suppliers and the risks associated with them.

In 2025, the Group conducted a review of social and environmental risks within its supply chain. These actions aimed to improve the tools used by the Group, enabling better identification and management of potential risks. To further strengthen ethical standards, the Elemental Group has a Supplier Code of Conduct outlining the expectations placed on business partners. All suppliers and subcontractors are required to review and accept its provisions before entering cooperation.

Elemental Group is an associate member of the London Platinum and Palladium Market (LPPM). This membership confirms to our stakeholders that maintaining the

highest standards throughout our supply chain is one of our core priorities. LPPM has long been recognised for upholding responsible trading practices in the platinum and palladium markets. The organisation sets strict refining standards and oversees market transactions, ensuring transparency and compliance with international requirements.

The Group uses a unified process for signing and managing contracts, which helps handle all contract-related matters efficiently. This approach ensures consistent decisions, fair treatment of suppliers, and good oversight of the entire contract portfolio, including identifying important contracts, risks, and other key issues.

Purchasing activities follow the Group's general procurement rules, with separate guidelines for production and non-production purchases.

Although the Group does not have a standalone Payment Policy, payments are made in line with agreed contract conditions. Payment-related rules are defined in the Group's Subsidiary Management Policy.

The Group follows a systematic approach to the implementation of international sanctions. As part of the procurement process, suppliers considered for cooperation are subject to sanctions screening. If a sanctions-related issue is identified, cooperation is not initiated or is discontinued if detected during the contract period.



G1-3 Prevention and detection of corruption and bribery

Elemental Group is committed to acting in a transparent, open and lawful manner, and therefore applies a zero-tolerance approach to corruption and any related misconduct. We continuously assess potential corruption risks and implement measures to manage them whenever such risks are identified. Anti-corruption activities are carried out in line with legal requirements, recognised good practices and the principles of an anti-corruption management system.

The Anti-Corruption Policy is the Group’s main document governing anti-corruption activities. It sets out the principles of anti-corruption conduct and defines the rights and responsibilities of individuals involved in these activities. The Policy has been developed in line with international anti-corruption laws, standards and best practices.

In the Group, the prevention of corruption and bribery is based on the same system for reporting and handling violations, which is described in section G1-1 under Whistleblowing Procedure. It ensures the detection of potential incidents, independent investigation, and decision-making while maintaining the principles of confidentiality and independence.

The Whistleblowing Procedure provides the foundation for our whistleblower system, which is used to investigate suspected violations of laws and internal policies. The policy applies globally across our value chain and is available to all employees as well as third parties. It ensures a safe and confidential environment for reporting misconduct and outlines the protections offered to individuals who report concerns or cooperate in investigations. The policy highlights the importance of safeguarding those who raise issues in good faith and describes the measures in place to protect whistleblowers throughout the investigation process.

During the 2025 financial year, Elemental Group provided training to its own workers on anti-corruption and anti-bribery, the Code of Conduct, and whistleblowing mechanisms and reporting procedures. Due to data availability limitations, the Group is currently able to disclose only the total number of training hours delivered and the total number of employees who participated in training during the reporting period. Training was mandatory for employees performing at-risk functions, while voluntary training was also available to other employees. More detailed breakdowns by employee category, delivery method or training frequency were not available for reporting purposes for the year. Details of its training during the year is as follows:

Anti-corruption and bribery training metrics		Total Employee
Training coverage:		
Total headcount		1064
Total receiving training (%)		86%
Delivery method and duration:		
Classroom training/ Computer-based training		1 hour
Frequency:		ad hoc
Topics covered:		
Code of Conduct (conflict of interest, workplace harassment, health and safety, human rights)		
Anti-corruption, anti-bribery and Gifts, and Hospitality Policy		
Whistleblowing mechanism and reporting procedures		

G1-4 Incidents of corruption or bribery

During the reporting period, the Group did not record any criminal charges, fines or other legal sanctions related to corruption or bribery. Likewise, no confirmed incidents were identified that would have led to the termination or non-renewal of contracts with business partners, and no public legal proceedings were initiated against the Group or its employees.

G1-6 Payment practices

The Group applies a responsible supplier payment practice that helps maintain a smooth supply chain and strengthen long-term business relationships. The average invoice payment period from the contractual or legally defined due date is 30 days or in accordance with the payment terms agreed in contracts. During the reporting period, the Group had no ongoing legal proceedings related to late payments.



APPENDICES

ESRS 2 General disclosures	5
BP-1 Basis for preparation of sustainability statement	5
BP-2 Disclosure of information related to special circumstances	6
GOV-1 The role of the administrative, management and supervisory bodies	6
GOV-2 Information provided to, and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	8
GOV-3 Integration of sustainability-related performance in incentive schemes	8
GOV-4 Statement on due diligence	9
GOV-5 Risk management and internal controls over sustainability reporting	9
SBM-1 Strategy, business model and value chain	10
SBM-2 Interests and views of stakeholders	15
SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	17
IRO-1 – Description of the process to identify and assess material impacts, risks and opportunities	23
IRO-2 – Disclosure requirements in ESRS covered by the undertaking's sustainability statement	25
ESRS E1 Climate change	28
ESRS 2 GOV-3-E1 Integration of sustainability-related performance in incentive schemes	28
E1-1 Transition plan for climate change mitigation	28
ESRS 2 SBM-3-E1 Material impacts, risks and opportunities and their interaction with strategy and business model	28
ESRS 2 IRO-1-E1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities	28
E1-2 Policies related to climate change mitigation and adaptation	30
E1-3 Actions and resources in relation to climate change policies metrics and targets	31
E1-4 Targets related to climate change mitigation and adaptation	32
E1-5 Energy consumption and mix	33
E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	34

ESRS E2 Pollution	39
ESRS 2 IRO-1-E2 Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	39
E2-1 Policies related to pollution	40
E2-2 Actions and resources related to pollution	40
E2-3 Targets related to pollution	40
E2-4 Pollution of air, water and soil	40
ESRS E5 Circular economy and resources	41
ESRS 2 IRO-1 – Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	41
E5-1 Policies related to resource use and circular economy	42
E5-2 Actions and resources in relation to resource use and circular economy	43
E5-3 Targets related to resource use and circular economy	44
E5-4 Resource inflows	45
E5-5 Resource outflows	46
ESRS S1 Own workforce	49
ESRS 2 SBM-3-S1 Material impacts, risks and opportunities and their interaction with strategy and business model	49
S1-1 Policies related to own workforce	50
S1-2 Processes for engaging with own workforce and workers' representatives about impacts	51
S1-3 Processes to remediate negative impacts and channels for own workforce to raise concerns	52
S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	52
S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	53

SI-6 – Characteristics of the undertaking’s employees	53
SI-7 – Characteristics of non-employees in the undertaking’s own workforce	55
SI-10 Adequate wages	55
SI-14 Health and safety metrics	55
SI-17 Incidents, complaints and severe human rights impacts	56
ESRS G1 Business conduct	57
ESRS 2 GOV-1-G1 The role of the administrative, supervisory and management bodies	57
ESRS 2 IRO-1-G1 Description of the processes to identify and assess material impacts, risks and opportunities	57
G1-1 Business conduct policies and corporate culture	58
G1-2 Management of relationships with suppliers	59
G1-3 Prevention and detection of corruption and bribery	60
G1-4 Incidents of corruption or bribery	60
G1-6 Payment practices	60





elemental