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Report on the LkSG (Supply Chain Due Diligence Act)

Reporting period from 01.10.2023 to 30.09.2024

Name of the organization: thyssenkrupp AG

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English version - In case of any inconsistencies the German version shall prevail.

A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the management

What responsibilities were defined for monitoring risk management during the reporting period?

The Group Function Legal & Compliance is responsible for monitoring risk management at thyssenkrupp AG in accordance with Section 4 (3) SCA. The Group General Counsel and Chief Compliance Officer has been appointed to perform these tasks.

A. Strategy & anchoring

A1. Monitoring of risk management & responsibility of the management

Has the management established a reporting process that ensures that it is regularly - at least once a year - informed about the work of the person responsible for monitoring risk management?

It is confirmed that the management has established a reporting process that ensures that it is informed regularly - at least once a year - about the work of the person responsible for monitoring risk management within the meaning of Section 4 (3) SCA.

- Confirmed

Describe the process that ensures reporting to management at least once a year or regularly with regard to risk management.

The Group General Counsel and Chief Compliance Officer reports on the results of the monitoring to the Executive Board of thyssenkrupp AG on an ad hoc basis, but at least once a year. He also informs the Group Risk & Internal Control department of the Group Function Controlling, Accounting & Risk regularly and as required and thus integrates the risk management system in accordance with SCA into thyssenkrupp's Group Risk Management, which is based on an internal set of rules.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Is there a policy statement that has been prepared or updated based on the risk analysis carried out during the reporting period?

The policy statement has been uploaded

www.thyssenkrupp.com/de/grundsatzerklaerung-tk-ag

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Has the policy statement for the reporting period been communicated?

It is confirmed that the policy statement has been communicated to employees, the works council if applicable, the public and the direct suppliers where a risk was identified in the risk analysis.

- Confirmed

Describe how the policy statement was communicated to the relevant target groups.

The policy statement was published on the intranet and on our corporate website and integrated into internal training courses. In addition, both the publication and the update were communicated internally via a newsletter.

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

What elements does the policy statement contain?

- Establishment of a risk management system
- Annual risk analysis in our own business area and of our suppliers
- Establishment of preventive measures in the company's own business area, with direct suppliers and, if applicable, indirect suppliers and their effectiveness review
- Corrective measures in own business area, at direct suppliers and, if applicable, indirect suppliers and review of their effectiveness
- Provision of a complaint procedure in the company's own business area, with suppliers and review of its effectiveness
- Documentation and reporting obligations
- Description of the priority risks identified
- Description of human rights-related and environmental expectations of own employees and suppliers
- Description of a process for reporting of possible misconduct

A. Strategy & anchoring

A2. Policy statement on the human rights strategy

Description of possible updates during the reporting period and their reasons.

The policy statement has been updated for the following reasons:
- The risk analysis was completed for the first reporting period: human rights and environmental risks and violations were identified, albeit to a manageable extent. These risks and violations are described in the update.
- Need for formal adjustments, especially of the Group organization
- Inclusion of the signatures of the members of the Executive Board so that the persons submitting the document are more clearly identified and the importance of the document is emphasized.

A. Strategy & Anchoring

A3. Anchoring the human rights strategy within the own organization

In which relevant departments/business processes was the anchoring of the human rights strategy ensured during the reporting period?

- Personnel/HR
- Environmental management
- Occupational safety & occupational health management
- Communication / Corporate Affairs
- Purchasing/Procurement
- Supplier management
- CSR/Sustainability
- Legal/Compliance
- Revision
- Economic Committee
- Other: - Controlling, Accounting & Risk
  - International Committee

Describe how responsibility for implementing the strategy is distributed within the various specialist departments/business processes.

The Executive Board of thyssenkrupp AG is responsible for implementing the Group-wide concept for compliance with human rights and environmental due diligence obligations. Implementation is carried out by the SCA Council Group, a body made up of representatives of the functions and segments relevant to compliance with these due diligence obligations.

The spokesman of the SCA Council Group is the SCA Officer Group, who reports directly to the Executive Board of thyssenkrupp AG on behalf of the Council. The SCA Council Group assumes a governance role vis-à-vis the segments and companies of the thyssenkrupp Group by defining regulations for the Group-wide implementation of the requirements of the SCA and coordinating their implementation. In addition to the further development of the Group-wide concept, the SCA Council Group assumes the role of an advisor in cooperation with the segments and businesses and offers the opportunity for cross-segment exchange. To take into account the individual requirements and supply chains of our businesses, these are each represented by their own segment manager, the so-called SCA Officer Business. The segment manager reports to the SCA Council Group and the segment's Management Board, among others, and is responsible for implementing the Group-wide concept for compliance with human rights and environmental due diligence obligations in the businesses.

Further information on the allocation of responsibilities at thyssenkrupp can be found at:

www.thyssenkrupp.com/de/geschaeftsverteilung-tkag-okt24

Describe how the strategy is integrated into operational processes and procedures.

Our Group-wide concept for compliance with human rights and environmental due diligence obligations is characterized by an integrated and interdisciplinary risk management system. With our multi-level approach, we have implemented uniform minimum standards in the thyssenkrupp Group that our businesses can apply and expand in a targeted manner to minimize risk. In addition to identifying and coordinating human rights and environmental risks, the SCA Council Group is also responsible for communicating the results, including to the Group Executive Board. Representatives from the various central functions and divisions as well as from our segments are members of the SCA Council Group. Through interdisciplinary cooperation between the various central functions, other experts and the segments within the SCA Council Group, we ensure that our Group-wide concept is integrated into operational risk management processes and procedures.

Describe which resources & expertise are provided for implementation.

As described above, the interdisciplinary composition (e.g. engineers, merchants, lawyers) of our SCA Council Group ensures that all relevant expertise at Group level, including "Risk & Internal Control Management", as well as our businesses, are represented in our committee. The relevant resources are provided by the respective specialist departments or within the segments. Internal training courses are held, some of which are also accompanied by external consultants.

B. Risk analysis and Preventive measures

B1. Implementation, procedure and results of the risk analysis

Was a regular (annual) risk analysis carried out during the reporting period to identify, weight and prioritize human rights and environmental risks?

- Yes, for the own business area
- Yes, for direct suppliers

Describe the period in which the annual risk analysis was carried out.

The risk analysis for the company's own business area was carried out once during the reporting period. Issues that arise after the end of the reporting period are included in the risk analysis for the next reporting period. Exceptional circumstances or critical events that occur outside of the respective reporting period can be proactively addressed as an exception in the risk analysis and report if necessary.

For direct suppliers, risk analysis is carried out on an ongoing basis over the entire reporting year using an IT-supported risk analysis system.

Describe the risk analysis procedure.

thyssenkrupp works continuously to analyze the human rights and environmental impacts of its business activities in order to minimize potential risks and their occurrence. To this end, thyssenkrupp has created a Group-wide concept for compliance with human rights and environmental due diligence obligations, which is characterized by an integrated and interdisciplinary risk management system for compliance with human rights and environmental due diligence obligations.
A central component of the risk management system is risk analysis, both for the company's own business area and for the supply chain, in which risks are analyzed on the basis of Group-wide sustainability criteria relating to human rights, occupational health and safety and environmental protection ("SCA risk areas")
are assessed,
- the operational implementation of measures to minimize or eliminate identified risks, and
- a barrier-free, publicly accessible complaints procedure reporting possible
misconduct.
Our SCA risk areas are divided into the following individual risks:
- Human rights: child labor; forced labor; discrimination in the workplace; freedom of association; remuneration and working hours; land grabbing; outsourced labour; contamination; protection of discrimination; protection of freedom of expression, personal rights and privacy
- Occupational health and safety: particularly due to obviously inadequate safety standards, lack of appropriate protective measures and of protective equipment; lack of measures to prevent fatigue, inadequate training of employees

- Environmental rights: use / storage / disposal of chemicals and waste; generation of emissions and consumption of energy and water.

With our multi-level approach, we have implemented uniform minimum standards in the thyssenkrupp Group that our Group companies can apply and expand in a targeted manner to minimize risk. Our risk analysis is updated continuously and at least annually. We also carry out a new risk analysis as required, e.g. in the event of a change in the risk situation. In addition to managing and coordinating the monitoring of relevant risks, the SCA Council Group reports regularly to the Group Executive Board on the risk management system and the results of the risk analysis performed.

Risk analysis in the own business area:
We include all our activities in Germany and abroad that are undertaken for the manufacture and utilization of products and the provision of services in our own business segment.

The risk analysis in the own business division is carried out in four stages. Firstly, the risk potential of the companies is determined based on a combination of abstract country and sector risks of the SCA assets. The risk potential is expressed using a risk index between 0 and 100, with 100 being the best possible value. In the second step, the effectiveness of Group-wide guidelines, policies and management processes with regard to SCA assets is assessed and assigned a score between 0 and 100. The third component is the self-disclosure of the Group companies, which assess business risks as part of the group-wide Risk & Internal Control management (RIC) and provide information on the risks of the specific Group company and the risk-mitigating measures. This includes the risks relating to a violation of the SCA protected assets. This risk assessment is submitted internally in electronic form by persons responsible for the business (usually managing directors). This ICS risk assessment is also translated into a risk index between 0 and 100. Finally, the average value for the final abstract risk index is calculated from the values of these three steps and set in relation to other qualitative characteristics such as existing certifications, audits, the number of complaints and, if applicable, other characteristics in order to arrive at a final risk assessment. The results are evaluated, aggregated and consolidated centrally and assessed in the SCA Council Group. Identified risks are mitigated by the Group companies by measures as far as possible.

Risk analysis for direct suppliers:
Based on the individual SCA risks, we subject our direct suppliers to a basic risk analysis and identify an abstract risk potential for them in relation to our

"SCA risk areas". In addition to a varying weighting of individual SCA risks, our ongoing risk analysis also takes into account, among other things, external risk indices, the location and industry of the suppliers, the scope of purchasing volume, the type of goods supplied, results from self-reporting by suppliers, as well as the severity and irreversibility of potential events. New, potential suppliers are checked for their risk potential before a collaboration is established. After evaluating the data sources for the risk analysis, overall risk profiles are created for direct suppliers. Suppliers with particularly high human rights and environmental risks identified as a whole are classified as potentially risky. These potentially high-risk suppliers are successively subjected to a specific risk analysis in accordance with the business-specific prioritization.

Our risk analysis is updated continuously and at least annually. We also carry out a new risk analysis as required, for example in the event of a change in the risk situation. Based on the results of the risk analysis for specific suppliers, an SCA risk category is defined for each supplier. Our Group companies use this SCA risk category as a basis for taking suitable preventive measures to further mitigate the risk of individual suppliers. Prioritization is based on the identified risk, our causal contribution to the human rights or environmental risk or to the violation of a human rights or environmental obligation, the degree of our influence and taking into account the characteristics of the respective business. Suppliers with particularly high human rights and environmental risks identified as a whole are classified as potentially risky.

The SCA Council Group is responsible for managing and coordinating the monitoring of relevant risks and reports to the Group Executive Board on the risk management system and the results of the risk analysis performed. Findings relating to indirect suppliers are incorporated into our risk analysis on an ad hoc basis.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were event-driven risk analyses also carried out during the reporting period?

- Yes, due to substantiated knowledge of possible violations at indirect suppliers
- Yes, due to other reasons: Complaints in own business area

Describe the specific occasions.

Own business area:
As a result of complaints we received regarding two sites in Hungary, we were notified of alleged obstruction of works council work and disregard of co-determination rights, as well as of gender discrimination and other misconduct not relevant to the SCA at another location.

Indirect suppliers:
A request for information from the BAFA informed thyssenkrupp about possible violations of human rights obligations by indirect suppliers:
The specific occasion was the strike by predominantly Eastern European truck drivers at the Gräfenhausen freeway service station in Southern Hessian, which began in March 2023 and lasted several weeks.
The drivers worked for a Polish haulage company and went on strike over months of unpaid wages and health and safety violations.

Describe what findings the analysis has led to with regard to a significantly changed and/or expanded risk situation.

Own business area:
The risk analysis confirmed an extended risk situation in both cases. In the case of the obstruction of the works council's work, the legal misjudgement with regard to the local co-determination rights of a manager was the cause. In the case of gender discrimination and other misconduct by individual employees and managers that was not relevant to the SCA, the causes were local HR and management issues as well as other fundamental and established forms of behavior within the company.

Indirect suppliers:
The risk analysis revealed that the lack of transparency in the subcontracting of logistics services by direct and indirect service providers poses an increased risk concerning compliance with human rights due diligence obligations in transport supply chains. Although thyssenkrupp was not directly affected, structural weaknesses in the supply chain were identified, particularly with regard to the disclosure of subcontracting and

the associated risks for compliance with labor standards. Furthermore, workplace conditions assessments were carried out at the carriers concerned in order to review working conditions in the supply chain.

Describe the extent to which findings from the processing of information/complaints have been incorporated.

Own business area:
In both cases, the information/complaints received via our complaints procedure were followed up by task forces, which investigated and clarified the facts on site and prioritized the risks at these locations as part of the specific risk assessment. The information/complaints contained sufficiently concrete descriptions of the circumstances and course of events to ensure that the facts could be clarified. The findings were taken into account accordingly in the assessment of the site risks and the adjustment of the prioritization of the sites.

Indirect suppliers:
Following a request for information from the BAFA, thyssenkrupp was informed of possible violations of human rights obligations by indirect suppliers. Discussions were then held with those allegedly involved with regard to their supply chains in order to clarify the facts and ensure that appropriate measures are taken. In addition, risks in the transport sector were prioritized as part of the risk analysis. For example, thyssenkrupp's logistics employees were made more aware of human rights risks in the logistics sector through training and employees are encouraged to act sensitively when subcontracting in the transport sector.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) in your own business area?

- Disregard for freedom of association - freedom of association & right to collective bargaining
- Other prohibitions: - Gender discrimination and other misconduct not relevant to the SCA

  - Disregard of employee rights

  - thyssenkrupp operates in countries where freedom of association is legally limited or not guaranteed.
  The above-mentioned risks "Gender discrimination..." and "Obstruction of works council work" were specifically identified locally at two sites in Hungary. No risks beyond a general latent residual risk were identified for the other objects of protection.

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for direct suppliers?

- Prohibition of hiring or using private/public security forces that could lead to impairments due to lack of instruction or control
- Disregard for occupational health and safety and work-related health hazards
- Destruction of the natural basis of life through environmental pollution
- Disregard for freedom of coalition association - freedom of association & right to collective bargaining
- Unlawful violation of land rights
- Prohibition of forced labor and all forms of slavery
- Prohibition of unequal treatment in employment
- Ban on child labor
- Prohibition of withholding an appropriate wage
- Other prohibitions: Identified risks (human rights and environmental) are in part potential risks based on country and industry from the abstract risk analysis. thyssenkrupp is a company with a global and widely ramified supply chain. For this reason, no risk can be excluded with absolute certainty in the abstract risk analysis. The concrete examination of risks is carried out successively according to prioritization and weighting.
- Prohibited production and/or use of substances within the scope of the Stockholm Convention (POPs) and non-environmentally sound handling of waste containing POPs
- Prohibited import/export of hazardous waste within the meaning of the Basel Convention
- Prohibited production, use and/or disposal of mercury (Minamata Convention)

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Results of the risk assessment

What risks were identified in the risk analysis(es) for indirect suppliers?

- Disregard for occupational health and safety and work-related health hazards
- Prohibition of withholding an appropriate wage

B. Risk analysis and preventive measures

B1. Implementation, procedure and results of the risk analysis

Were the risks identified in the reporting period weighted and, if applicable, prioritized and, if so, on the basis of which appropriateness criteria?

- Yes, based on the expected severity of the injury in terms of degree, number of people affected and irreversibility
- Yes, based on own influence
- Yes, based on the probability of occurrence
- Yes, based on the nature and scope of the company's own business activities
- Yes, based on the type of causal contribution

Describe in more detail how the weighting and prioritization process was carried out and what considerations were made.

Risk analysis in the own business area:
Compliance with human rights has long been a central component of thyssenkrupp's corporate culture and is expressed in the mission statement, the Code of Conduct and the International Framework Agreement, as well as the associated processes. Two local risk areas were identified on the basis of complaints and corresponding measures were taken and prioritized accordingly. We continue to see risks in dealing with freedom of association in some countries in which thyssenkrupp is active. The identified risks were determined by comparing an abstract index with other qualitative characteristics such as existing certifications, audits, the number of complaints and, where applicable, other characteristics in order to arrive at a final risk assessment. The results are evaluated, aggregated and consolidated centrally and assessed by the SCA Council Group with regard to risks.
Identified risks are mitigated by the Group companies with measures as far as possible.

Risk analysis for direct suppliers:
The systematically derived abstract risk analysis already includes a weighting of risk potential for all suppliers based on severity, irreversibility and probability of occurrence. As part of the business-specific prioritization, other available findings are taken into account in addition to the purchasing volume, such as the individual ability to influence the supplier. In addition to the factors already mentioned above for prioritizing suppliers and their identified risks, the factors "strategic relevance of the supplier" and "connection / relevance for value creation" are also taken into account. In addition, suppliers with whom no further business relationships and therefore no orders or new contracts are planned are deprioritized.

Due to thyssenkrupp's globally distributed supplier base, various human rights risks were identified as part of the abstract risk analysis. No risks were prioritized, but all risks were considered equally. The consideration of direct suppliers is based on the respective overall risk profile, which is formed by the holistic consideration of all identified potential risks. These potentially risky suppliers are successively subjected to a detailed analysis in accordance with the business-specific prioritization.

In principle, prioritization is the responsibility of the individual business unit, taking into account all the factors mentioned, in order to make an appropriate assessment of the business requirements.

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

Which risks were prioritized in your own business area during the reporting period?

- Disregard for freedom of coalition association - freedom of association & right to collective bargaining
- Other prohibitions: Gender discrimination and other misconduct not relevant to the SCA

Disregard of freedom of coalition - freedom of association & right to collective bargaining

What specific risk is involved?

[Hungary] At one site, works council work has been obstructed by the disregard of co-determination rights in the monitoring and control of employees. [Other countries] Restrictions on the right to freedom of coalition

Other prohibitions

What specific risk is involved?

Discrimination against another gender. Based on complaints received, incidents were uncovered that showed that discriminatory behavior and other misconduct not relevant to the SCA had occurred in some areas of the site.

Note: The risks described in this section were identified at various Hungarian locations and should be considered in isolation

B. Risk analysis and preventive measures

B2. Prevention measures in own business area

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks in your own business area?

- Implementation of training courses in relevant business areas
- Other/further measures: - Display of information posters on the complaints procedure
  - Measures in relation to the local risk of "obstruction of works council work"
  - Measures in relation to the local risk "Gender discrimination and other misconduct not relevant to the SCA"

Implementation of training courses in relevant business areas

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

In the thyssenkrupp Group, employees in the relevant areas in Germany with a valid e-mail address and access to a company computer are automatically registered for the e-learning basic training course on the SCA, which is offered in German and English. This training is mandatory and must be completed with a final test.
Employees who do not have access to a computer are made aware of the due diligence obligations and the complaints procedure through other measures:
- by displaying information posters in the production area and in the social rooms
- Copy of the information posters as an enclosure to the payslip
- Information events as part of works council meetings.

In addition to e-learning, special training courses were also held for the Purchasing department.

Describe the extent to which training to prevent and minimize the priority risks is appropriate and effective.

We use our training formats to raise our employees' awareness of our human rights and environmental due diligence obligations. The training courses explain our due diligence obligations, explain why these due diligence obligations are of central importance and how we want to achieve compliance with the due diligence obligations in the thyssenkrupp Group. In addition, the training courses describe the various channels of our complaints procedure and the protection against discrimination against the whistleblower. Employees learn how they can do their part to comply with the due diligence obligations - whether in relation to our own business area or in cooperation with our suppliers and who they can contact

if potential breaches of duty become known.
Participation in the training courses is controlled by a final examination. Only when this has been successfully completed the participant will receive a certificate and the training course is deemed to have been successfully completed.
At the end of the reporting period, around 27,500 employees of the thyssenkrupp Group had received direct training on the SCA and the complaints channels.

Other/further measures

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/area of application).

Information posters:
In the thyssenkrupp Group, posters with information about the complaints procedure were displayed in the production halls and social rooms, as a supplement to the payroll system, as well as in places generally intended for such information purposes in the eight most relevant languages for Group employees, with the aim of also reaching employees without intranet access.

Measures relating to the local risk of "obstruction of works council work":
1. Clarification of legal issues and classification vis-à-vis the local manager
2. Appointment of a contact person at the European Works Council for the local works councils
3. Training of managers, written agreement on future procedure with co-determination

Measures in relation to the local risk of "gender discrimination and other misconduct not relevant to the SCA":
Various personnel measures including the dismissal of employees and managers. Comprehensive project to raise awareness of the issue and strengthen the corporate culture, including external support and expertise.

Describe to what extent the measures to prevent and minimize the priority risks are appropriate and effective.

Information posters:
The display of information posters on the complaints procedure is a further building block in sensitizing our employees to human rights and environmental due diligence obligations and informing them about the possibility of making a complaint. After the posters were displayed, an increased interest in the complaints procedure was registered.

Measures relating to the local risk of "obstruction of works council work":
The effectiveness of the measures is evaluated using selected interview partners according to the

sampling principle will be checked on site in a timely manner.

Measures in relation to the local risk of "gender discrimination and misconduct not relevant to the SCA":
The preventive measures currently being implemented are part of a cultural change process that can be expected to be effective, as monitoring at a higher management level is part of the process. The broad involvement of the workforce should also ensure that effective measures are developed and implemented.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

Which risks were prioritized for direct suppliers during the reporting period?

- None

If no risks have been selected, give reasons for your answer.

Due to thyssenkrupp's globally distributed supplier base, various human rights risks were identified as part of the abstract risk analysis. No individual risks were prioritized, but all risks were considered equally. The consideration of direct suppliers is based on the respective overall risk profile

which is formed by taking a holistic view of all identified potential risks. Suppliers with particularly high human rights and environmental risks identified as a whole are classified as potentially risky. These potentially high-risk suppliers are successively subjected to a detailed analysis in accordance with the business-specific prioritization.

B. Risk analysis and preventive measures

B3. Preventive measures for direct suppliers

What preventive measures were implemented for the reporting period to prevent and minimize the priority risks at direct suppliers?

- Development and implementation of suitable procurement strategies and purchasing practices
- Integration of expectations into the supplier selection process
- Obtain contractual assurance for compliance and implementation of expectations along the supply chain
- Training and further education to enforce the contractual assurance
- Agreement and implementation of risk-based control measures

Other categories:

selected:

- Integration of expectations into the supplier selection process
- Obtain contractual assurance for compliance and implementation of expectations along the supply chain
- Training and further education to enforce the contractual assurance
- Agreement and implementation of risk-based control measures

Describe to what extent the measures to prevent and minimize the priority risks are appropriate and effective.

Measures (general):
By integrating our expectations into the supplier selection process, we try to identify potential risks at an early stage and, if possible, avoid them through targeted selection or deal with them in a structured, preventative manner. We generally expect each of our suppliers to take note of our expectations, which are summarized in our Supplier Code of Conduct, or, if it is a supplier with increased risk potential, to confirm compliance with and implementation of the expectations along the supply chain by means of a contractual assurance. In particular, if an increased risk potential is identified, we use the concept of contractual assurance, our specific risk analysis and a catalog of preventive measures to ensure that we identify our specific priority risks regarding suppliers and minimize them in cooperation with the suppliers. Depending on the risk potential identified, we request further evidence to further limit and specify the risk or carry out specific measures appropriate to the concrete risk, such as sustainability audits.

By agreeing contractual assurances with our risk suppliers, we sensitize our business partners in the course of the associated negotiation process with regard to our human rights and environmental expectations. We carry out the control measures agreed therein within the appropriate framework of a prioritization and implementation strategy, e.g. through accompanying self-assessments, supplier visits or audits.

Further risk-based control measures are planned and implemented on a business-specific basis. This is based on an individual implementation strategy that is geared towards the identified risks, business requirements and other prioritization criteria, such as the ability to exert influence. Risk-based control measures range from self-disclosures and structured supplier visits to externally commissioned sustainability audits. Where possible, suppliers can also be asked to join industry initiatives/standards.

The effectiveness of preventive measures is assessed on an ongoing basis. The key factor here is monitoring whether the measures implemented have reduced the risks identified at our suppliers.

Training courses:
We use our training formats to raise awareness of human rights and environmental due diligence obligations among our direct suppliers. The training sessions explain our expectations of our suppliers and why it is important that our employees emphasize the importance of our suppliers' compliance with due diligence obligations. In addition, the training courses focus on ensuring that participants understand how thyssenkrupp's approach to supplier due diligence is structured and integrated into our purchasing processes. One focus is therefore also on the topics of "contractual assurance" and maintaining the information in our Group-wide tool for human rights and environmental due diligence in the supply chain as well as the complaints processes installed at thyssenkrupp.

Category: Procurement strategy & purchasing practices

selected:

- Development and implementation of suitable procurement strategies and purchasing practices

Describe the measures implemented and the extent to which the definition of delivery times, purchase prices or the duration of contractual relationships have been adjusted.

thyssenkrupp is an internationally active Group that bundles its business activities as of 30.09.24 in 5 segments (Automotive Technology, Decarbon Technologies, Marine Systems, Materials Services and Steel Europe), which develop suitable procurement strategies and purchasing practices for themselves due to their decentralized organizational forms and different business models, as well as the business-specific distribution of risk.

In addition to the specific business requirements and the procurement market situation, which are generally decisive for the agreed delivery times and purchase prices, the expectations and values set out in the thyssenkrupp Supplier Code of Conduct provide the framework for the partnership-based cooperation we strive for.

Adjustments to delivery times or purchase prices have not been made solely on the basis of the measures implemented, but on the basis of general market-related considerations.

In principle, the measures implemented do not affect the duration of the contractual relationship. However, if our suppliers demonstrably fail to meet our expectations contained in the Supplier Code of Conduct and do not strive for and implement improvement measures or do not take remedial action within a reasonable period of time set by thyssenkrupp and a violation of a protected legal position is recognized and considered particularly serious, thyssenkrupp reserves the right to terminate or temporarily suspend individual or all contractual relationships.

Describe the extent to which adjustments to your own procurement strategy and purchasing practices should contribute to the prevention and minimization of priority risks.

As part of the supplier selection process, potential business partners are subjected to an abstract risk screening in advance and checked for their human rights and environmental risk potential. The risk potential identified is appropriately taken into account in the procurement strategy and the decision to award contracts. In particular, if an increased risk potential is identified, we have been using the concept of contractual assurance, our specific risk analysis and a catalog of preventive measures since the beginning of 2023 to ensure that we identify our human rights and environmental risks and minimize them in cooperation with suppliers. Depending on the risk potential identified, we request further evidence to further limit and specify the risk or carry out specific measures, such as sustainability audits.

At thyssenkrupp, we have transparently set out our expectations of our direct suppliers both in our Policy Statement and, especially, in our Supplier Code of Conduct. If our suppliers demonstrably do not meet our expectations contained in the Supplier Code of Conduct, do not seek and implement improvement measures anyway or do not take remedial action within a reasonable period of time set by thyssenkrupp and a violation of a protected legal position is identified and considered particularly serious, thyssenkrupp reserves the right to terminate or temporarily suspend individual or all contractual relationships.

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

Which risks were prioritized based on the event-related risk analysis for indirect suppliers?

- Disregard for occupational health and safety and work-related health hazards
- Prohibition of withholding an appropriate wage

Disregard for occupational health and safety and work-related health hazards

What specific risk is involved?

Exceeding driving times in the logistics sector, see event-related risk analysis

Where does the risk occur?

- Germany
- Poland

Prohibition of withholding an appropriate wage **What**

specific risk is involved?

- Withholding of an appropriate wage in the logistics sector, see event-related risk analysis
- Withholding of wages and wage deductions due to late deliveries or damage to the truck.

Where does the risk occur?

- Germany
- Poland

B. Risk analysis and preventive measures

B4. Preventive measures for indirect suppliers

What preventive measures were implemented for the reporting period to prevent and minimize priority risks at indirect suppliers?

- Supporting the supplier in preventing and minimizing risk
- Other/further measures: - Posters informing drivers about the established complaints procedure in their native language
  - WCA (Workplace Conditions Assessments)
  - Training courses
  - Supplier discussions

Describe the measures implemented and, in particular, specify the scope (e.g. number, coverage/scope).

- Posters to inform about the established complaints procedure at suitable locations in the thyssenkrupp logistics areas, especially at ramps, in order to reach relevant drivers and transporters. The posters contain a QR code that leads to the multilingual complaints procedure and refer to it in German, Polish, Hungarian, Romanian, Bulgarian, Czech, Slovakian, Croatian and Turkish.

- Conducting Workplace Conditions Assessments (WCA) with affected freight forwarders to review working conditions in the supply chain and to gain a better understanding of the industry and the human rights and environmental risks in the transport sector

- Training for thyssenkrupp logistics employees to raise awareness of human rights risks in the logistics industry when subcontracting and to ensure that subcontracting by suppliers is transparent to thyssenkrupp.

- Discussions with indirect suppliers to clarify the situation and ensure that appropriate measures are taken.

Describe to what extent the measures to prevent and minimize the priority risks are appropriate and effective.

- The audits and training courses carried out help to increase transparency and aim to improve working conditions at the suppliers concerned.

- The posters on the complaints procedure enable a direct and low-threshold possibility to report human rights violations in the native language of the drivers affected and potentially affected in the future.

- Training and audits raise awareness of risks and promote the transparent handling of subcontracting, which supports the implementation of human rights due diligence obligations.

B. Risk analysis and preventive measures

B5. Communication of the results

Were the results of the risk analysis(es) for the reporting period communicated internally to relevant decision-makers?

It is confirmed that the results of the risk analysis(es) for the reporting period have been communicated internally to the relevant decision-makers, such as the Executive Board, the management or the purchasing department, in accordance with Section 5 (3) SCA.

- Confirmed

B. Risk analysis and preventive measures

B6. Changes to the risk disposition

What changes have occurred with regard to priority risks compared to the previous reporting period?

Own business area:
The local cases of gender discrimination and other misconduct not relevant to the SCA as well as violations of the freedom of association were treated as priority risks in our own business area. Compared to the previous year, the risk of gender discrimination and other misconduct not relevant to the SCA has therefore been added.

Supply chain:
Compared to the previous reporting period, the prioritization of risks in the area of suppliers has changed to the effect that risks in the area of logistics are now considered to be more important for indirect suppliers. The BAFA's request for information described in Chapter B1 showed that there are risks of human rights violations among indirect suppliers, particularly in the logistics sector. The risk of human rights violations in the logistics industry is taken seriously by thyssenkrupp, as thyssenkrupp is dependent on extensive transportation services due to its diverse product portfolio. This potentially affects all segments, and a Group-wide approach is necessary.

C. Identification of violations and remedial measures

C1. Identification of violations and corrective measures in own business area

Were any breaches identified in your own business area during the reporting period?

- Yes, only abroad

Please specify: In which topics were violations identified in your own business area?

- Disregard for freedom of coalition association - freedom of association & right to collective bargaining
- Other prohibitions: Gender discrimination and other misconduct not relevant to the SCA

Describe the appropriate remedial action you have taken.

Disregard for freedom of coalition association:
Establishment of a task force made up of employees at the next highest management level under the leadership of the segment's Chief Human Resources Officer.
The facts of the case were investigated on site, with the involvement of local co-determination representatives and representatives of the European Works Council. A legal classification was carried out by local lawyers. All management measures that were not established in accordance with co-determination were terminated.
Additional preventive measures were also defined:
Under the moderation of the task force, management and the local works council agreed on how to work together in future. The Works Council was given a contact person from the European Works Council and the next higher management level, who are to be informed if the agreement is not adhered to.

Gender discrimination and other misconduct not relevant to the SCA: E Establishment of a task force under the leadership of the segment's Chief Human Resources Officer, consisting of employees at the next highest management level as well as an external law firm specializing in such matters and representatives of the corporate Compliance, Human Resources and Communications departments under the leadership of the segment's Chief Human Resources Officer.
A large number of discussions were held on site with victims, witnesses and accused persons by an investigation team. An open consultation hour was set up in case other victims wished to report the matter. The publication of the allegations on an internet portal by an unknown whistleblower made the matter public, which is why the investigation was accompanied by intensive employee communication. The investigation was concluded with the result that individual personnel measures, including dismissals, were implemented during the reporting period. Preventive measures in the sense of a cultural change are beeing implemented.

In cases where injuries could not be stopped, describe where they occurred.

Both identified injuries were terminated.

Describe what long-term remedial measures (e.g. follow-up concepts) have been taken and what considerations have been made with regard to the selection and design of the measures for termination or further minimization.

Obstruction of works council work:
Definition of clear escalation paths in the event of a violation of this legal position.

Gender discrimination and other misconduct not relevant to the SCA:
Development of culture-changing measures together with employees. This process began at the end of the reporting period. In this respect, it is not yet possible to describe any final, long-term measures.

Describe how the effectiveness of the corrective measures is verified.

Obstruction of works council work:
The effectiveness of the remedial measures will be reviewed in the coming financial year by interviewing those affected.

Gender discrimination and other misconduct not relevant to the SCA: Monitoring of the cultural change process by the next higher management level.

Have the remedial measures led to the cessation of the injury?

- Yes

Explain.

With the help of the remedial measures taken, the infringements have been brought to an end.

Have you analyzed to what extent the identified violation is an indication of a possible need to adapt/add to existing prevention measures? Please describe the process, results and impact of your analysis.

The identified breaches were localized and could be effectively ended by the remedial measures described. In both cases, the established task force developed local preventive measures, as described, or defined preventive measures that are now being implemented in order to minimize the risks in the future. A comparison of the circumstances relating to the violations with the findings from the general risk analysis, the complaints procedure and the self-disclosure by the other Group companies did not give rise to any need to supplement or adapt existing Group-wide preventive measures, as these already address the aforementioned risks.

C. Identification of injuries and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

Were any violations identified at direct suppliers during the reporting period?

- Yes

Describe the basis on which the identified violations were weighted and prioritized and what considerations were made.

The violations identified at direct suppliers during the reporting period were weighted and prioritized according to the following criteria:
• Nature, extent and duration of the infringement (individual case/systematic)
• the seriousness of the infringement, taking into account the impact on the persons concerned, in particular with regard to the irreversibility and irreparability of the damage
• Classification as a violation within the meaning of Section 2 (2) and (3) SCA
• thyssenkrupp's influence on and contribution to injury or risk within the meaning of Section 3 (2) SCA
On this basis, the violations identified were transferred to a structured process (corrective action plan) and are being processed by the thyssenkrupp business unit responsible for the supplier in question, taking into account the prioritization of risks and the severity of the violations.

The violations identified that led to a business interruption were of an intensity that the company considered to be serious in each case

In which areas were violations identified at direct suppliers?

- Disregard for occupational health and safety and work-related health hazards
- Prohibition of withholding an appropriate wage

Describe the appropriate remedial action you have taken.

- Corrective action plans were drawn up for all identified breaches of duty, which were agreed with the suppliers and followed up by the relevant business units.

- Close cooperation with affected suppliers, including conducting on-site visits and commissioning re-audits to review progress in implementing the measures.

- Adjustments such as organizational changes, the introduction of system-side control systems, establishment of fire department teams, employee training, monitoring of maximum working hours and marking of escape routes to improve safety standards.

- Installation of missing work safety measures, including fire alarms, fire extinguishers, emergency exit lighting, eye showers and securing lifting hooks to reduce accidents.

- Documentation of working hours, employment contracts and wage payments as well as employment contract regulations for temporary workers. Ensuring sufficient rest periods and work-free days.

- Ensuring that all employees have the necessary personal protective equipment.

- Conducting fire drills for all shifts to ensure comprehensive safety for all employees.

Describe what considerations were made with regard to the selection and design of the measures as part of the corresponding follow-up concepts for termination and minimization

Immediately after the respective violations became known, the direct suppliers were requested to submit a statement within a short period of time. In the case of the existing breaches of duty, this was already done as part of audits. Based on the breaches of duty identified, individual measures were initiated to end the breaches or minimize their impact. When prioritizing the measures, the consequences of the specific breach for the individuals affected and the extent to which damage can be repaired were also taken into account. These measures are each documented in a corrective action plan, scheduled and have been/will be tracked until they are confirmed as having been rectified. Depending on the type and scope of the breach of duty, the defined measures are completed by means of a written confirmation, evidence (e.g. photo documentation), follow-up inspections on site or follow-up audits, e.g. for suppliers with a large number of breaches of duty.

Due to the refusal to remedy the identified breaches of duty, the ultima ratio was applied to 3 suppliers in the reporting year and the business relationship was suspended or terminated in accordance with the criteria of Section 7 (3) SCA.

Describe how the effectiveness of the corrective measures is verified.

As part of internal SCA audits, the process for the effective implementation of corrective measures was reviewed at the reporting units.
In addition to this, the measures are reviewed as part of the audits carried out, with the results of the audits being incorporated into the further development and implementation of the Corrective Action Plans.

Have the remedial measures led to the cessation of the injury?

- Partially

Explain.

Some of the remedial measures have led to the cessation of the breaches of duty identified. In other cases, the measures are still being implemented and are continuously monitored. Corrective action plans and re-audits have been initiated to remedy remaining violations and ensure the effectiveness of the measures. In cases of non-cooperation, strict measures were taken, such as blocking the supplier. Due to the refusal to remedy the identified breaches of duty, the ultima ratio was applied to 3 suppliers in the reporting year and the business relationship was suspended or terminated in accordance with the criteria of Section 7 (3) SCA. Ending violations is an ongoing process that is implemented in close cooperation with the suppliers concerned to ensure sustainable improvements. All measures are monitored and followed up in accordance with the specified deadlines. Until now, business relationships with three suppliers have been terminated in accordance with the criteria of Section 7 (3) SCA, as these suppliers were not willing to cooperate in ending the breaches of duty.

Have you analyzed to what extent the identified violation is an indication of a possible adjustment/addition to existing prevention measures? Describe the process, results and impact.

On the one hand, the findings from the breaches of duty identified have confirmed the previous approach of using audits to create transparency, raise awareness and make concrete improvements at strategic and high-risk suppliers.
On the other hand, the focal points identified in the case of injuries were used to further develop the existing prevention measures.
In the current reporting year, the portfolio of external sustainability audits was expanded to include additional providers and standards in order to ensure better coverage of risks. In addition, frequently occurring breaches of duty were specifically queried in the self-disclosures and corresponding topics were proactively highlighted in supplier training.
In addition, supplier due diligence training has been revised and will be made available as an e-learning module in order to achieve a broader and continuous sensitization of business partners with regard to human rights and environmental obligations.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

Describe the cases in which injuries could not be terminated.

Some suppliers did not fully implement the agreed remedial measures in the reporting period, which meant that breaches of duty, particularly in the areas of occupational health and safety, working hours and fair pay, could not yet be fully resolved. In such cases, some business relationships were suspended and alternative procurement options evaluated.

Although the measures have been initiated at some suppliers, the necessary evidence for full implementation is still missing. The review will be carried out through planned follow-up audits, which are currently being coordinated.

An accident at work was classified as a particularly serious injury. The supplier refused to investigate the incident and implement measures after multiple requests. In this case, thyssenkrupp AG saw no milder means than to block the supplier and suspend the contractual relationship for the time being.

In the event of breaches of duty, such as disregard for occupational health and safety and unacceptable working conditions, the implementation of the measures is monitored through continuous follow-up and re-audits to ensure that the measures are effective in the long term.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

Describe what long-term remedial measures have been taken, in particular what trade-offs have been made with regard to the selection and design of the measures as part of the corresponding follow-up concepts for termination and minimization.

Long-term remedial measures have been adapted to the respective context and the challenges faced by suppliers. Regular information on the progress of the measures is obtained to ensure that suppliers resolve the problems quickly.

Violations were weighted and measures identified, communicated and monitored to ensure improvements. The aim remains to develop sustainable solutions in collaboration with audit service providers and suppliers, with business terminations only considered as a last resort to promote long-term partnerships and compliance with due diligence obligations. In some cases, however, alternative sources of supply had to be used, and problematic business relationships were terminated.

Regular risk analyses ensure a continuous review of suppliers in order to identify risks at an early stage and take action. The measures are aimed at finding suitable solutions to minimize the risks depending on the breach of duty, be it through alternative sources of supply or by supporting suppliers to make sustainable improvements.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

Describe how the effectiveness of the corrective measures is verified.

The effectiveness of the remedial measures is ensured by various methods. The respective method depends on the type of breach of duty identified. This may, for example, involve following up a corrective action plan resulting from an audit or carrying out re-audits or targeted supplier visits. All information is documented in order to enable continuous tracking of the measures and thus to be able to check their effectiveness.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

Describe what the specific timetable for the concept looks like.

The corrective measures are implemented as part of a structured corrective action plan that defines clear deadlines for eliminating the identified breaches of duty. These deadlines have been communicated to the affected suppliers and are tailored to the severity and priority of the violations. Serious violations are rectified first in order to ensure a rapid improvement in conditions.

Where necessary, follow-up audits are scheduled in coordination between the audit service providers and the suppliers in order to check the progress and implementation of the measures. Regular supplier confirmations are carried out to document the implementation status of the corrective action plan and to ensure that all measures are carried out as planned.
Most of the measures have already been successfully implemented and only a few infringements are still outstanding. These are to be completed in the near future.
In addition, thyssenkrupp is in close contact with the suppliers concerned in order to offer support in implementing the measures within the scope of its own possibilities and to ensure that the agreed deadlines are met. Regular audits and reviews are carried out to continuously monitor progress and ensure that all planned measures are effective in the long term.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

Specify which measures were taken into consideration when creating and implementing the concept.

- Joint development and implementation of a plan with the company that caused the injury
- Temporary suspension of business relations
- Other: Corrective Action Plans (CAPs) were drawn up and implemented to remedy breaches of duty. Measures included upgrades in occupational safety, such as the installation of safety equipment and improvements to protective devices. Follow-up was carried out in writing and on site and follow-up audits were planned. Working conditions were improved through time recording, appropriate rest periods and fair pay. Measures were developed together with the suppliers.

C. Identification of violations and corrective measures

C2. Identification of violations and corrective actions at direct suppliers

If there were breaches at direct suppliers during the reporting period that could not be resolved within a foreseeable period of time:

In how many cases was the business relationship with one or more direct suppliers terminated as a result of the breaches?

3

C. Identification of violations and corrective measures

C3. Identification of breaches and corrective actions for indirect suppliers

Were any violations identified at indirect suppliers during the reporting period?

- Yes

Describe on what basis the identified violations were weighted & prioritized and what considerations were made.

The violations identified were weighted and prioritized on the basis of several criteria. The violations identified related to suppliers further down the supply chain. BAFA had pointed out this violation in the request for information mentioned in Chapter B1. The violations identified were therefore prioritized according to type, scope and duration, as well as the extent and potential irreparability of the consequences for the persons concerned.

Describe what remedial actions, if any, have been taken and, in particular, what considerations have been made in relation to the selection and design of measures as part of the corresponding concepts for termination and minimization.

Various corrective measures were taken to end and minimize the identified violations, which were documented in a Corrective Action Plan (CAP), scheduled and tracked until they were confirmed. When selecting the measures, particular consideration was given to the severity of the breaches, the feasibility and the potential benefits of the respective measures.
Workplace conditions assessments were carried out to ensure the sustainability of the improvements. These were aimed at achieving compliance with working standards. At the same time, they served to identify potential risks so that preventive action could be taken. In addition, training was offered to logistics employees to raise awareness of the issue of subcontracting and ensure that future subcontracting is transparent and in accordance with the human rights due diligence obligations. In addition, a further poster campaign was included, which provides information about the complaints procedure at relevant points within the logistics areas in order to inform those affected of their rights at a low threshold.

In which areas were violations identified at indirect suppliers?

- Disregard for occupational health and safety and work-related health hazards
- Prohibition of withholding an appropriate wage

C. Identification of violations and corrective measures

C3. Identification of breaches and corrective actions for indirect suppliers

If breaches at indirect suppliers could not be prevented, ended or minimized within a foreseeable period of time despite appropriate concepts:

Describe your further measures.

The identified violations were terminated.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

In what form was a complaints procedure offered for the reporting period?

- In-house complaints procedure

Describe the company's own process and/or the process in which your company participates.

To counteract violations of laws and internal Group regulations at an early stage and reduce damage to thyssenkrupp employees and business partners, thyssenkrupp has established a grievance procedure for all Group companies. This procedure covers possible violations of human rights and environmental due diligence obligations and ensures that information in this regard can be reported, received and processed by employees of thyssenkrupp as well as external parties, such as our direct and indirect suppliers and their employees.

The complaints procedure enables anonymous, barrier-free and worldwide submission of complaints on request. Every whistleblower receives a confirmation of receipt, provided that all the necessary information has been submitted. As part of our process, we protect the interests of whistleblowers not only by setting up a secure whistleblowing system, but also by promising to treat incoming reports confidentially and to protect whistleblowers acting in good faith against any disadvantages resulting from a report by any means necessary. Whistleblowers can also report completely anonymously, provided this is legally permissible.
Complaints are received centrally via various reporting channels, which can be accessed at
https://www.thyssenkrupp.com/en/company/compliance/whistleblower-system
The persons entrusted with the management of the whistleblower system impartial action, are independent, are not bound by instructions and are obliged to maintain confidentiality.

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Which potentially involved parties have access to the complaints procedure?

- Own employees
- Communities in the vicinity of own locations
- Employees at suppliers
- External stakeholders such as NGOs, trade unions, etc
- Other: any legal and natural person

How is access to the complaints procedure ensured for the various groups of potentially involved parties?

- Publicly accessible rules of procedure in text form
- Information on accessibility
- Information on responsibility
- Information on the process
- All information is clear and understandable
- All information is publicly accessible

Publicly accessible rules of procedure in text form Optional:

Describe.

-

Information on accessibility

Optional: Describe.

-

Information on responsibility

Optional: Describe.

-

Information on the process Optional:

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-

All information is clear and understandable Optional:

Describe.

-

All information is publicly accessible Optional:

Describe.

-

D. Complaints procedure

D1. Establishment of or participation in a complaints procedure

Were the rules of procedure for the reporting period publicly available?

File has been uploaded

The Rules of Procedure:

https://www.thyssenkrupp.com/_binary/UCPthyssenkruppAG/deb28f96-3d31-4801-b499-f7026bcce42b/Verfahrensordnung_EN.pdf

D. Complaints procedure

D2. Requirements for the complaints procedure

Indicate the person(s) responsible for the procedure and their function(s).

1. Compliance Officer of the Legal & Compliance department - Compliance Investigation (receipt of the complaint, plausibility check and forwarding; procedural rules)

2. Labor Relations Expert of the Human Relations Management - Labor Affairs & Pensions department (receipt of the complaint, plausibility check and processing/forwarding)

3. Person(s) responsible in each business unit (further processing of the complaint and documentation)

It is confirmed that the criteria contained in Section 8 (3) SCA are met for the responsible parties, i.e. that they offer the guarantee of impartial action, are independent and not bound by instructions and are obliged to maintain confidentiality

- Confirmed

D. Complaints procedure

D2. Requirements for the complaints procedure

It is confirmed that precautions were taken during the reporting period to protect those potentially involved from being disadvantaged or penalized as a result of a complaint.

- Confirmed

Describe what precautions have been taken, in particular how the complaints procedure ensures the confidentiality of the identity of whistleblowers.

Appropriately trained specialist departments are responsible for this, working according to the "need to know" principle and safeguarding the confidentiality of identity. We protect the interests of whistleblowers not only by setting up a whistleblowing system that is secure in terms of IT technology and data protection law, but also through our commitment to treat incoming reports confidentially and to protect whistleblowers acting in good faith against any disadvantages resulting from a report by any means necessary. Whistleblowers can also report completely anonymously, provided this is legally permissible.

Describe what precautions have been taken, in particular what other measures are in place to protect whistleblowers.

Whistleblowers are also protected by a specially secured IT tool for reports. Furthermore, we sensitize potentially involved employees/departments, who may have to deal with the whistleblowers or the processing of the reports received, through appropriate training.

D. Complaints procedure

D3. Implementation of the complaints procedure

Did you receive any information about the complaints procedure during the reporting period?

- Yes

Provide details on the number, content, duration and outcome of the procedures.

A higher double-digit number of SCA-relevant complaints were received in the reporting year. It should be noted that the number of complaints received does not indicate the extent to which a violation has actually occurred.
Two SCA-relevant violations were identified during the processing of the complaints. The processing time for the complaints received was between 14 days and 6 months.

On which topics have complaints been received?

- Disregard for occupational health and safety and work-related health hazards
- Disregard for freedom of coalition association) - freedom of association & right to collective bargaining
- Prohibition of unequal treatment in employment
- Prohibition of withholding an appropriate wage
- Other prohibitions: - Gender discrimination and other misconduct not relevant to the SCA
  - Noise emissions from production operations
  - Direct discharge of untreated wastewater into the river at a supplier

Describe what conclusions have been drawn from the complaints/reports received and to what extent these findings have led to adjustments in risk management.

The identified violations were isolated individual cases that were ended with appropriate remedial measures.
However, there is no need to adjust the risk management method.

E. Review of risk management

Is there a process in place to review the appropriateness and effectiveness of risk management across the board?

In which of the following areas of risk management is the appropriateness and effectiveness checked?

- Preventive measures
- Remedial measures
- Complaints procedure

Describe how this audit is carried out for the respective area and what results it has led to, particularly with regard to the prioritized risks.

The effectiveness of preventive and corrective measures and the complaints procedure is reviewed on an ongoing basis and as required.
For the thyssenkrupp Group, the Chief Compliance Officer and General Counsel is responsible for the effectiveness review; he reports on the results of the review to the Executive Board of thyssenkrupp AG at least once a year.

The effectiveness review at thyssenkrupp consists of two components: Firstly, a review is carried out by means of internal audits. The audits focus on all legal interests and positions protected by the SCA, such as human and environmental rights, as well as the effectiveness of the company's internal SCA risk management system, including both areas of application. Secondly, both quantitative and qualitative indicators are used for the review. Both components are used to identify and implement potential improvements to the existing SCA risk management system.

The review of preventive measures is based on the extent to which they adequately address the risks identified.
On the one hand, this is done by asking specific questions in the above-mentioned audits. On the other hand, the documentation is used to check the extent to which prioritized risk mitigations result from already established preventive measures and the extent to which further adjustments may be necessary. During the reporting period, no risks were identified in the units audited that would have required such adjustments.

The effectiveness of the remedial measures introduced is reviewed on a case-by-case basis.

The effectiveness of the complaints procedure is reviewed on the basis of the number of SCA-related complaints received compared to the previous financial year. A detailed evaluation of the quality and processing of the complaints received is also carried out.

The review has shown that there are no indications that the complaints procedure was not effective during the reporting period.

E. Review of risk management

Are there processes or measures in place to ensure that the interests of your employees, the employees within your supply chains and those who may otherwise be directly affected in a protected legal position by the economic activity of your company or by the economic activity of a company in your supply chains are adequately taken into account in the establishment and implementation of risk management?

In which areas of risk management do processes or measures exist to take into account the interests of those potentially affected?

- Preventive measures
- Remedial measures
- Complaints procedure

Describe the processes and measures for the respective area of risk management.

Taking into account the interests of potentially affected parties is a central task for us in the continuous improvement process of risk management.
thyssenkrupp has always been committed to its responsibility as a fair employer. This means that we take our social responsibility seriously, are committed to good working conditions worldwide and also expect certain principles and standards from suppliers and business partners. This requires minimum standards. That is why thyssenkrupp AG, the European Works Council, the Group Works Council, the IG Metall trade union and the IndustriALL Global Union concluded an International Framework Agreement (IFA) on global minimum labor standards within the Group back in 2015.
In addition to the recognition of the ILO core labor standards and the Universal Declaration of Human Rights, the IFA includes principles on good occupational health and safety, opportunities for professional and personal development, the right to appropriate remuneration, the prohibition of child and forced labor and the prohibition of discrimination of any kind. We want these standards and principles to be implemented throughout the thyssenkrupp Group.
Violations of these principles are therefore investigated. An online-based reporting system is available to record possible violations. An International Committee, set up with the involvement of the Group Works Council, European Works Council and trade union, has the task of intervening in the event of violations or disputes that cannot be resolved locally. This committee incorporates the interests of employees in the pursuit of minimum standards.
We also try to work externally through our cooperation with relevant initiatives, such as UN Global Compact, Econsense, the human rights working group of the German

Institute for Compliance, or the Federation of German Industries to integrate the perspective of potentially or actually affected persons or groups of persons as well as possible. We consider information from suppliers and interested parties.