

2023 SUSTAINABILITY REPORT



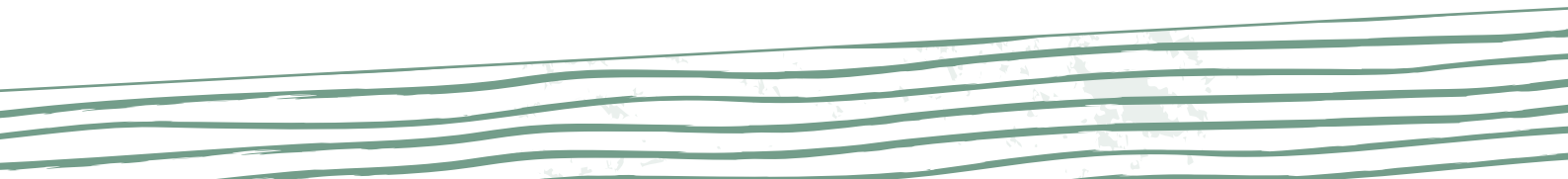


#ELTENLOOP

ELTEN's heart beats in Uedem in Germany's Lower Rhine region. This is where everything has come together since 1910, and a large part of our production still takes place on site in Uedem. Proving ourselves to be a responsible business has always been our goal. As a family-owned company, thinking in generations is rooted in our DNA

Our holistic approach to sustainability is not just a strategy, but an intrinsic motivation. We see sustainability as a process. As part of the ELTEN Loop sustainability strategy, we have set ourselves a number of ambitious targets when it comes to the environment, society, corporate governance and product quality. As a leading manufacturer of foot protection, we are also strengthening our position by driving innovation in terms of sustainability.

The sustainability information you are about to read in this report relates to the reporting period between 01.01.2023 and 31.12.2023. The structure of this sustainability report, as well as the topics addressed, is based on the draft of the European Sustainability Reporting Standards (ESRS) for the proposed Corporate Sustainability Reporting Directive (CSRD).





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ABOUT ELTEN

Tradition and progress go hand-in-hand at ELTEN GmbH, which has been making shoes in Germany's Lower Rhine region for over a hundred years now. Founded in Uedem in 1910, the family business is today one of the leading manufacturers of foot protection products in Europe. ELTEN is currently run by the fourth generation of leaders.

The company is synonymous with the highest quality standards and innovative foot protection technologies. Partnerships with leading scientific institutions have contributed to our progress, alongside use of the most modern soling systems in the world.

Some of our 400 or so employees have been part of the ELTEN family for generations. That means proven know-how remains on site. To this day, final production of our shoes still takes place in the Lower Rhine region, and ELTEN shoes are shipped to a number of European countries and beyond from our Uedem Logistics Centre.

ELTEN GmbH has specialised in the production of certified foot protection. ELTEN makes shoes from leather that has been produced in environmentally-friendly conditions. We are committed to supporting responsible leather production globally. That's why we are proud members of the Leather Working Group (LWG).



At ELTEN, people are at the heart of everything we do. From making simple yet innovative orthopaedic adjustments to many of our shoe models – certified in accordance with PPE regulations – to our SensiCare inlay soles, which offer relief at work for people with non-standard arches, a firm focus on the customer is all part of the service. But ELTEN takes customer service one step further. In 2011, we were able to transform a neighbouring villa, Haus Drei Eschen, into a modern conference and events space, offering our customers and partners alike new seminar and conference facilities with modern events technology. And in the ELTEN Academy, we have developed an extensive range of training courses, from the basics of foot protection to events for junior salespeople, as well as scientific lectures on the latest innovations in the footwear market.

To further improve both comfort and safety in terms of foot protection, here in Uedem, we've been investing intensively in research and development for years now, working closely with a range of experts and scientists. This has led to groundbreaking technological innovations and foot protection product ranges, as we continue working hard to offer even greater safety and comfort in the workplace.

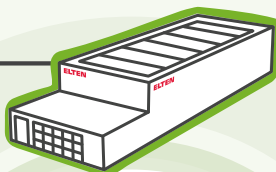
ELTEN at a glance

**FOUNDED
IN 1910**

**COMPANY
HEADQUARTERS
IN UEDEM**

**113
YEARS
OF EXPERIENCE
AND EXPERTISE**

**APPROX. 400
EMPLOYEES**



ELTEN

**A FOURTH-
GENERATION
GERMAN FAMILY
BUSINESS**

**A MANUFACTURER OF
FOOT
PROTECTION**

**APPROX.
500 MODELS
OF SHOES**



GENERAL INFORMATION

STRATEGY, BUSINESS MODEL AND VALUE CHAIN

Our ultimate goal is to ensure the safety and protection of those who wear our shoes. We offer our diverse customer base industry-specific solutions across three different brands.



ELTEN is now one of Europe's leading manufacturers of foot protection, having established ourselves as an innovative brand. To keep meeting the latest demands and continuously optimising the level of protection we're able to offer consumers, we are constantly working with our partners on new solutions in foot protection technology.



Joining forces to combine our individual strengths, Lowa and ELTEN have been evolving the Lowa Work Collection since 2006, particularly targeting the outdoor and craft sector. Working together, we are continuously optimising technology, function and design.



Under the name Jori by ELTEN, we offer foot protection with a keen focus on quality, high levels of comfort and sophisticated designs at entry level prices. The brand is particularly popular with our customers in industry, craft and the service sectors.

Alongside EN ISO 20345 for all safety footwear and EN ISO 20347 for occupational footwear, our fire and rescue boots meet EN 15090 standard. We also offer cut resistant footwear, in accordance with EN ISO 17249, and protective footwear for foundries and welding, in accordance with EN ISO 20349-1.

Safety footwear are our flagship products. In order to keep providing our customers with a comprehensive service, we also offer an extensive orthopaedic support system.

Our aim is to improve foot health, optimise comfort when wearing our shoes, and increase performance in the workplace. Our professional foot care service meets the highest safety standards and focuses on biomechanical principles so as to respect the individual needs of our customers.

In our local store – also in Uedem – we offer shoes, work and trade clothing, as well as various other services, including feet measuring, a clothing finishing service, and orthopaedic care.

We also sell our shoes via our online store. Other B2B sales channels include industry retailers, specialist workwear shops, professional hardware shops, as well as online and PPE specialist dealers.

Our shoes are used in a wide variety of applications. Some of our key customer groups include:

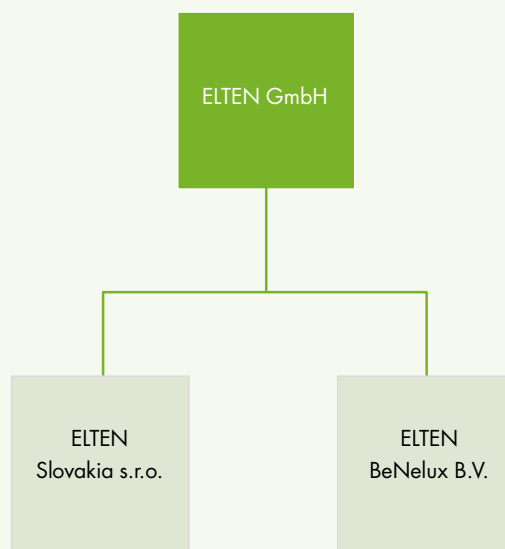
- Industrial companies
- Craft businesses
- Service companies
- Utility companies

ELTEN has a solution for almost every industry and sector, whether it is people working in construction, industry, agriculture and forestry, hotels and hospitality, fire and rescue, or even those working in the medical professions and care staff. Our major sales markets are located within Europe.

ELTEN GmbH’s head office is in Uedem in North Rhine-Westphalia, close to the Dutch border. Our head office is home to our administration and development departments, alongside production – with a state-of-the-art automatic soling system – and our logistics centre, with its very own automated warehouse.

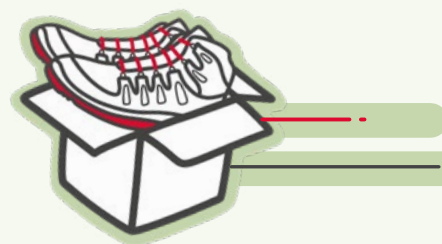
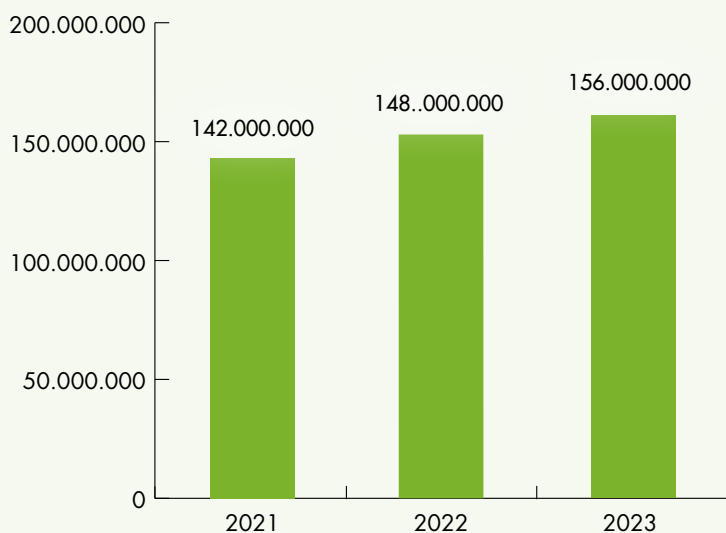
At the close of the reporting period on 31.12.2023, ELTEN employed a total of 395 people. Our sales representatives cover various German regions and other European countries. Our subsidiary ELTEN Slovakia s.r.o. forms part of our value chain and provides its own production facilities. Some of our international sales take place under the umbrella of ELTEN BeNelux B.V., based in the Netherlands.

ELTEN GmbH organisation chart



Sales (€)

(including additional sales, such as shoelaces and inlay soles)



SUSTAINABILITY STRATEGY AND GOALS

Our sustainability strategy is known as the **ELTEN Loop**. It's a holistic approach with four fields of action: environment, society, corporate governance and product quality.



Environment

We strive to manufacture products sustainably, minimise our use of resources, and use environmentally-friendly materials. As we look to the future, pioneering projects around circular economy will be key.



Society

At ELTEN, people are at the heart of everything we do. We are committed to complying with labour and human rights, and protecting the interests of employees and workers in the value chain.



Corporate governance

We actively assume our corporate responsibilities and fulfil our due diligence obligations. Our ethical business practices and fair business relationships are the foundations of our approach.



Product quality

Our high quality standards ensure optimal health protection and help to create a long product life cycle. Through non-stop research and development, we are able to constantly present innovations to achieve the highest levels of safety.

OUR VALUES

We're not just a commercial enterprise, we're also a family business, which has always placed great importance on taking responsibility for people and the environment. Our values demonstrate what is important to us and are the beliefs we live by.

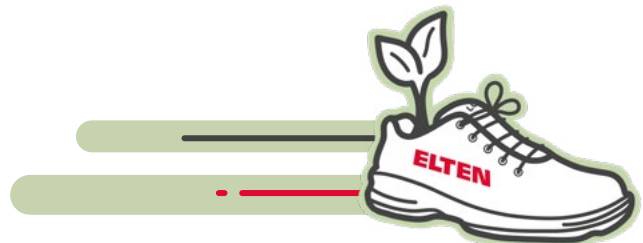
Authentic: ELTEN is rooted in a small community with a tradition for shoemaking. We have shaped the history of this community just as much as it has shaped us.

Forward-looking: We are always open to experimentation, to change, and we're constantly on the lookout for new and exciting innovative ideas.

Honest: Transparent and open communication is extremely important to us – both internally and with our partners, customers and other stakeholders.

Helpful: Helping others comes naturally to us. Alongside our social commitment, we support skilled professionals and others who are interested in learning more about foot protection.

Reliable: Reliability is a key component here at ELTEN and covers the dependability and quality of our products, as well as the trustworthiness of the company as a whole.



Our goals within these key fields of action are based on our overriding vision: creating the ultimate safety footwear.

This is a shoe that meets the highest quality requirements and levels of comfort, contains recycled materials, whose value chain is transparent, has been designed to make use of resources for the most amount of time possible and reduce emissions, is manufactured in Germany using renewable energies, respects demanding water and chemical management practices, as well as ambitious social and environmental standards and, aside from all that, is competitively priced!

Our ultimate goal as a manufacturer of foot protection is to always offer people safety and protection.

In this report, we want to share sustainability information so that we can keep making progress towards our vision of the ultimate safety shoe, explaining what actions we've identified and implemented, what goals we've been able to achieve within the reporting period, and what targets we're still working towards for the future.

Our four fields of action are also reflected within this report, with product quality forming part of the [Customers and Consumers](#) topic.



SUSTAINABLE DEVELOPMENT GOALS

In conjunction with the Paris Climate Agreement of December 2015, the United Nations General Assembly adopted Agenda 2030 that same year. The purpose of the Agenda is to reconcile global economic development with social justice and the planet’s ecological limits. Agenda 2030 is made up of 17 Sustainable Development Goals (SDGs), which were designed as guidelines for states and organisations alike.

At ELTEN, we’re conscious that our economic activities have an impact on the conditions in our own production sites, as well as those of other companies belonging to our supply chain, both at home and abroad. Furthermore, we see it as our duty to adapt our business operations to the core part of Agenda 2030: implementing the SDGs.

While all 17 SDGs serve as a guide for organisations and companies, we’re focusing on those five goals that are most relevant to us and our stakeholders, without losing sight of the others.



Within the individual topic areas, we have named the specific sub-goals of our five objectives, which we are acting on with the help of the respective measures.

ACTING RESPONSIBLY

We see it as our corporate duty to take responsibility for our actions – and that goes for our entire global value chain. Because we profit from the benefits of the globalised world and the division of labour, we must also take responsibility for the effects of our business activities on people and the environment. A more detailed explanation of our precautionary approach is summarised in the [Workers in the value chain](#) topic.

CSR POLICY

Key international agreements and principles are clearly stipulated in ELTEN’s Corporate Social Responsibility (CSR) Policy and are considered guiding principles for all ELTEN activities. The policy forms the ethical business principles for all our employees. In it, we commit, among other things, to total legal compliance and

transparency, as well as to continuously improving our business processes from an environmental, social and societal point of view. The policy also sets out how we deal with our business partners and customers.

Our CSR commitments extend to all facets of our business. This includes, but is not limited to, the following:

1. Ethics

Committing to acting ethically and with integrity in all business decisions and activities. This includes saying no to corruption, bribery, fraud and any other unethical business practices in any form.

2. Labour and human rights

Fully respecting and supporting internationally recognised labour and human rights, as set out in the funda-

mental principles of the International Labour Organization (ILO) and the United Nations Universal Declaration of Human Rights.

3. Environment

Reducing our environmental footprint by using resources efficiently, adopting renewable energies and minimising waste and emissions.

4. Sustainable sourcing

Taking social and environmental criteria into account when selecting and working with suppliers and partners to ensure our supply chain meets the highest sustainability standards.

We regularly update our CSR Policy and monitor compliance. More detailed information is set out in the [Governance-Information](#) topic.

CODE OF CONDUCT

The ELTEN Code of Conduct forms the basis of our cooperation with business partners. It sets out binding behavioural guidelines for suppliers, business partners and service providers in relation to legally-compliant and ethical behaviour. It forms the basis of all procurement contracts and sets out, among other things, minimum requirements for working conditions and

environmental standards when producing our shoes. Our Code of Conduct is constantly evolving in the context of ever-increasing demands and our own voluntary commitments.

ELTEN GmbH's Code of Conduct is based on and makes reference to:

- The United Nations (UN) Universal Declaration of Human Rights (UDHR)
- Conventions and recommendations of the International Labour Organization (ILO)
- United Nations Guiding Principles on Business and Human Rights (UNGPs)
- OECD Guidelines for Multinational Enterprises
- United Nations Children's Rights and Business Principles
- Gender Dimensions of the Guiding Principles on Business and Human Rights
- OECD sectoral guidance



A worker on our partner's site in Romania.

The eleven core elements of ELTEN's Code of Conduct are as follows:

1. The rights of freedom of association and collective bargaining

We respect the rights of our employees to come together to form unions and other forms of employee associations, and to conduct collective bargaining.

2. Fair remuneration

We respect the rights of our employees to fair remuneration.

3. Occupational health and safety

We guarantee a healthy and safe working environment by assessing risks and taking all the necessary steps to eliminate or mitigate these risks.

4. Special protection for young workers

We grant special protections to all employees who are not yet of legal age.

5. No bonded, forced labour

We do not engage in any form of slavery, human trafficking or involuntary work.

6. Ethical business behaviour

We do not tolerate any form of corruption, extortion, embezzlement or bribery.

7. No discrimination

We offer equal opportunities and do not discriminate against our employees.

8. Decent working hours

We comply with the laws on working hours.

9. No child labour

We do not employ anyone under the minimum legal age.

10. No precarious employment

We only employ people on the basis of documented employment relationships in accordance with the law.

11. Protection of the environment

We take the necessary steps to prevent environmental damage.



ELTEN's Code of Conduct
is publicly available:
[ELTEN's Code of Conduct.](#)

CERTIFICATIONS AND MEMBERSHIPS

ELTEN GmbH has successfully worked with a quality management system, certified in accordance with ISO 9001, since 1993. With the help of annual audits, we are able to ensure our processes comply with this international quality management standard. We are also ISO 14001 certified. The overriding goal of this certifi-

cation is to promote environmental protection, reduce negative environmental impacts, and therefore properly implement environmental goals. The Pirmasens Test and Research Institute is an accredited certification body that tests and audits our systems for us.



Member of amfori, the leading global business association for sustainable trade.
For more information visit www.amfori.org.

As a member of the [amfori Business Social Compliance Initiative](#) (BSCI) we are committed to continuously improving working conditions and protecting human rights in global supply chains. We are committed to implementing amfori BSCI principles in our supply chain. Our Code of Conduct is based on amfori BSCI's own code, and our suppliers must undertake to adhere to the initiative in a binding manner. Regular social audits of our suppliers are carried out based on a risk analysis.



ELTEN is a member of the Federal Association of the German Footwear and Leather Goods Industry (HDS/L). [HDS/L](#) represents manufacturing companies in these industries, advocating on their behalf among the retail sector, authorities and legislators.



[cads](#) – cooperation for assuring defined standards for shoe and leather goods production – has defined its own limits for restricted substances. These often exceed the legal requirements. As a member, we have committed to comply with cads limits.



The [Leather Working Group](#) (LWG) is a non-profit organisation that collaborates with many companies worldwide to ensure that leather is produced in an environmentally friendly manner and in compliance with high standards. ELTEN has been a member of the LWG since 2023 in order to support more responsible leather production.

AWARDS

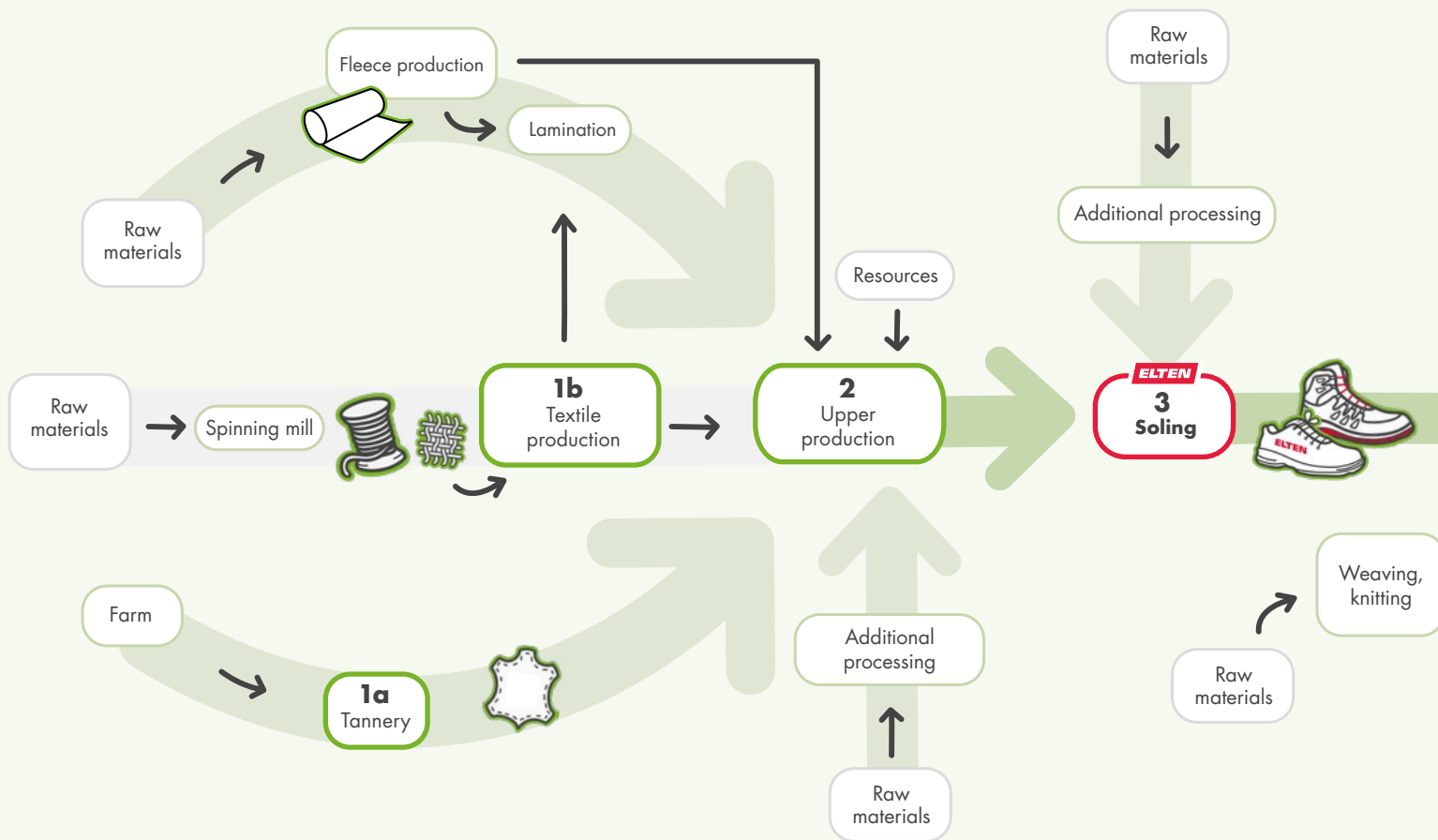


The [PFI ECO-Label](#) certifies social and environmental sustainability on our Uedem site. PFI carries out regular inspections of our operations, covering everything from chemical management to handling waste, water and energy. It also requires documented monitoring of international supply chains with regard to demanding social standards. ELTEN has been PFI eco Label certified since 2022.



[EcoVadis](#) is an international platform which offers sustainability ratings based on four categories: environment, labour and human rights, ethics and sustainable procurement. In 2023, we were awarded a gold medal for the second time in a row. This puts ELTEN in the top 2% of the entire industry.

Simple overview of the processing stages involved in the shoe supply chain:



VALUE CHAIN

The foot protection value chain is complex. Products are subject to high quality and safety standards and require many individual components. Producing and processing these components are often part of global networks. From extracting raw materials and processing them to transportation and upper production, there are many stages involved, often carried out by different suppliers.

The value chain also involves suppliers of other components, such as safety toecaps, eyelets and hooks. Soling also takes place at our own production facilities in either Germany or Slovakia.

1a – Tannery: Using tannins, skins are stabilised and preserved, whereby leather is created.

1b – Textile production: Fibres and threads are turned into fleece, woven and knitted materials.

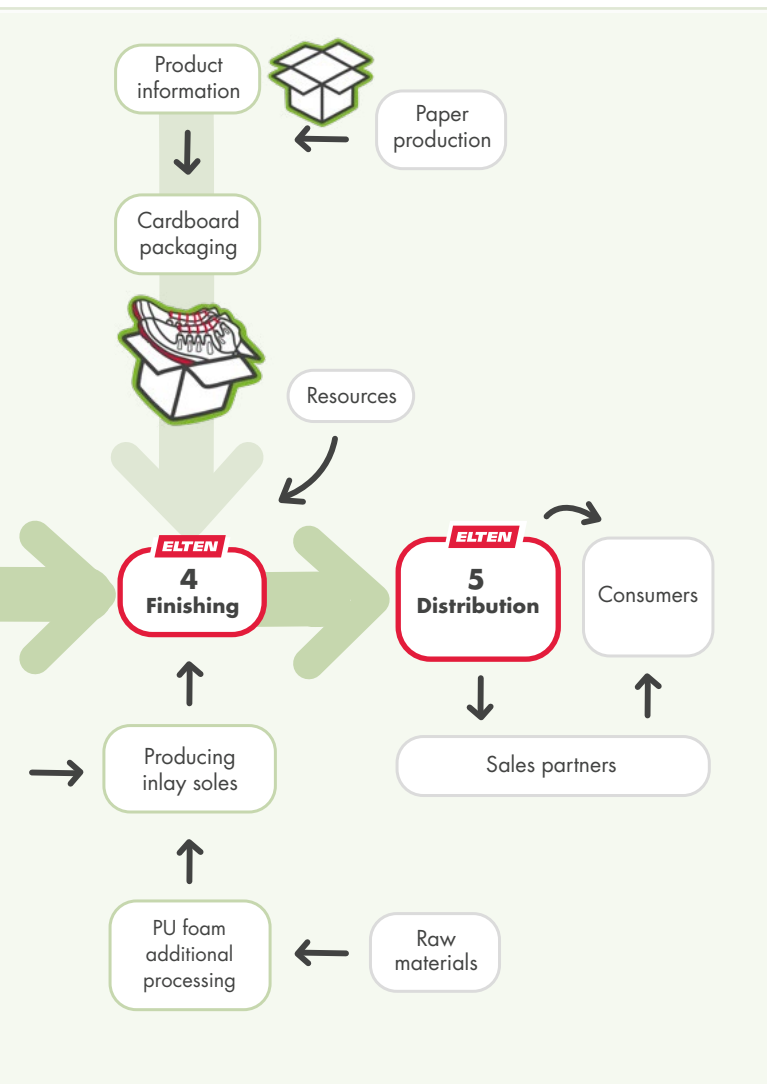
2 – Upper production: During upper production, the upper is made by sewing together all the textile or leather parts, as well as assembling any smaller parts of the upper.

3 – Soling: In Uedem and Slovakia, uppers are soled using DESMA's state-of-the-art production systems.

4 – Finishing: In the final production stages, the finishing touches are made to our shoes, for example, inserting inlay soles and packing shoes into boxes.

5 – Distribution: We deliver to our customers and end users from our logistics centre in Uedem.

When assessing the extent of impact, risk and opportunity management, our policies, actions and targets don't just include our own business operations in Germany on our Uedem site, but also both upstream and downstream throughout the value chain.



As well as Germany, the most important countries within our value chain in 2023 were China, India, Romania, Pakistan and Slovakia.

The most important raw materials for foot protection are leather and synthetic fibres for the upper, as well as polyurethane (PU), thermoplastic polyurethane (TPU) and nitrile butadiene rubber (NBR) for the sole. Additional materials are caps made of steel or plastic and counter stiffener partially made from recycled CDs and DVDs (thermoplastic polycarbonate).

THE SHOE INDUSTRY

Germany is one of the largest shoe producers in the European Union. The German shoe industry is mainly concentrated in Rhineland Palatinate, Bavaria, North Rhine-Westphalia, Lower Saxony and Baden-Wuerttemberg. It is a mid-sized industry. Just 4% of com-

panies employ over 500 people. A total of 17,000 people work in Germany’s shoe industry. According to HDS/L, around 8,990 of them were working for the 33 companies with over 50 employees in the first half of 2023. Total sales by German shoe manufacturers amounted to €1.17 billion in the first quarter of 2023, slightly up compared to the same period of the previous year (€1.11 billion). Inflation and general price rises explain this 5.4% growth.

The shortage of skilled workers that is affecting many parts of the economy hasn’t spared the German shoe industry. The industry as a whole is increasingly struggling to fill vacancies and find new apprentices. According to HDS/L, the number of apprentices enrolled on vocational shoemaking courses was at a critical level by the beginning of the school year 2022/2023.

Alongside men’s, women’s and children’s shoes, the German shoe industry doesn’t just make shoes designed for comfort or sport, but also foot protection produced according to standard. While the market for the everyday shoe segment is primarily focused on fast changing consumer habits, in the legally-regulated foot protection market, occupational safety standards and the requirements of professional associations play a key role.

While casual shoes are now predominantly manufactured entirely overseas, when it comes to foot protection, it is often only the most elaborately sewn shoe uppers that are imported from abroad. Final production still partially takes place in Germany. Foreign producers are now entering the market within this sector, and counterfeit products and imitations are on the rise.

(Sources: Hans Böckler Foundation, 2021 Market Analysis of the Leather and Shoe Industry; HDS/L 2024)

STAKEHOLDER ENGAGEMENT AND MATERIALITY ANALYSIS

PROCESS FOR IDENTIFYING AND ASSESSING KEY IMPACTS, RISKS AND OPPORTUNITIES

Understanding the needs and expectations of our stakeholders is vital to being able to identify our most relevant topics in terms of sustainability.

Stakeholders include all the people, groups, organisations and institutions that are either directly or indirectly affected by, or could be affected by, our business activities. Their interests could be of a financial, economic, environmental, social, societal or non-material nature.

We must differentiate between internal stakeholders, working on an operational level within the company, and external stakeholders. In order to record, examine and assess all the interests of our various stakeholders when conducting our business, we need to have open and honest dialogue. We interact with relevant stakeholders on a variety of different topics within the framework of specifically chosen formats, for example, via surveys, events or taking part in various initiatives and projects.



Based on the interests of stakeholders, we carried out an analysis in accordance with the principle of double materiality to identify, assess and prioritise key topics for the 2023 reporting year.

These cover [environmental information](#):

- Climate action
- Environmental protection
- Resource use and circular economy

[social information](#):

- Own workforce
- Workers in the value chain
- Customers and consumers

and governance information:

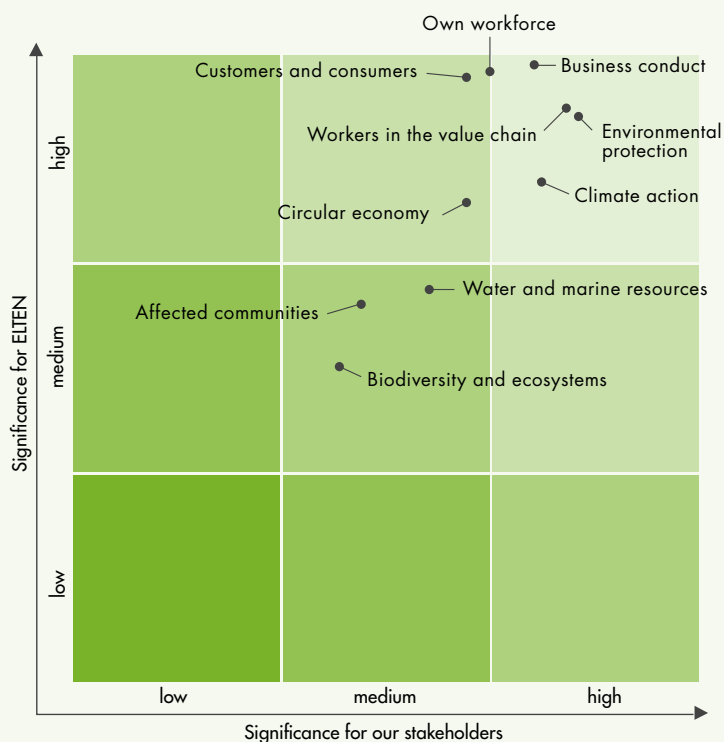
- [Business conduct](#)

	Management	Employees	Sales partners	End customers	Suppliers and service providers	Competitors	Investors	The public/media	Local area/ neighbours	Government/ authorities	Environment/nature	Industry associations/ initiatives	NGOs
Climate action	●	◐	◐	●	◐	◐	●	◐	●	●	●	◐	●
Environmental protection	◐	◐	◐	●	◐	◐	◐	◐	◐	●	●	◐	●
Water and marine resources	◐	◐	◐	◐	◐	○	◐	◐	◐	◐	◐	◐	◐
Biodiversity and ecosystems	◐	◐	◐	◐	◐	○	◐	◐	◐	◐	◐	◐	◐
Circular economy	●	◐	◐	◐	◐	◐	◐	◐	◐	●	●	◐	●
Business conduct	●	◐	●	◐	◐	◐	●	◐	◐	◐	◐	◐	◐
Own workforce	●	●	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐	◐
Workers in the value chain	●	◐	●	●	●	◐	◐	◐	◐	◐	◐	◐	●
Affected communities	◐	◐	◐	◐	◐	○	◐	◐	◐	◐	◐	◐	◐
Customers and consumers	●	◐	●	◐	◐	◐	◐	◐	◐	◐	◐	◐	○

Relevanz: ● high ◐ moderate ◑ medium ◒ low ○ very low

The impacts, risks and opportunities of our business model on certain topics – water and marine resources, biodiversity and ecosystems, affected communities – are relatively low. Similarly, our stakeholders see them as less relevant. That doesn't mean we consider them irrelevant.

However, in our reporting, we only focus on topics identified as significant. We constantly review the extent to which our assessment of the significance of individual areas has changed.





ENVIRONMENTAL INFORMATION

Environmental protection and conservation are very important to us. It's why we select the materials we use responsibly, sort our waste carefully, increase our energy efficiency, pursue various recycling initiatives, and raise awareness among our employees and other stakeholders about important environmental issues. We're not just contributing to preserving natural resources, but also positioning our company for the future.

CLIMATE ACTION

IMPACTS, RISKS AND OPPORTUNITIES

We are aware of the importance of energy efficiency and using renewable energies to protect the climate. We strive to minimise the harmful effects of our production processes. The advantages of energy efficiency are manifold. Alongside reducing CO₂e emissions, we also benefit financially as a company from using less energy. This all helps reduce risks, encourage innovation, retain customers, achieve competitive advantages and increase our market value. Using renewable energies also brings many benefits.

Replacing fossil fuels with renewable energies must be seen as a competitive factor, and therefore an important part of our corporate policy. Acting responsibly in relation to climate impacts also plays a crucial role in meeting our stakeholders' expectations. Nowadays,

stakeholders expect us to have climate action in place, including reducing our energy consumption and CO₂e emissions, as well as using renewable energies.

As a company, we're guided by international climate goals and initiatives, such as the Paris Climate Agreement, the European Green Deal, and the Science Based Targets Initiative. People also expect us to transparently and credibly verify, report and publish data about our energy efficiency and CO₂e emissions.



POLICIES AND ACTIONS

ELTEN has introduced a range of actions designed to save energy, minimise CO₂e emissions and mitigate climate change. They are based on comprehensively monitoring and documenting our energy consumption and CO₂e emissions. We carry out an annual CO₂e audit, in accordance with the Greenhouse Gas (GHG) Protocol. The GHG Protocol is a private, global framework to measure and manage greenhouse gas emissions and the associated reporting.

Data is taken from internal records and external sources before being calculated with the help of an external service provider to ensure an accurate and reliable result.

The Protocol differentiates between three categories:

- **Scope 1:** All direct emissions that occur from your own business operations, e.g. from heating your premises using gas or the fuel used to run your own fleet of company vehicles.
- **Scope 2:** Indirect emissions associated with the purchase of electricity, steam or heat, e.g. obtained from the electricity grid.
- **Scope 3:** All other indirect emissions, both upstream and downstream. ELTEN currently takes into account water consumption, disposing of mixed municipal waste (EWC code 200301) as well as energy purchased for rented locations.

By monitoring and documenting this information, we know our figures, which means if any legal or self-imposed limits are ever exceeded, we can take immediate action to limit the emission-causing activities to achieve the desired goal. ELTEN's strategic business also involves regularly checking whether any new opportunities to use renewable energies have arisen. Production processes, electricity and gas consumption, company vehicles, business trips, product design and packaging, supply chains and customer relationships are all aspects that have an impact on energy consumption and CO₂e emissions at ELTEN. We're constantly identifying opportunities to boost our energy efficiency, for example, reducing consumption and emissions by introducing more energy-efficient processes and technologies. Using modern technologies and retrofitting our premises with energy-saving materials leads to a reduced reliance on fossil fuels.

We're constantly investing in modern machinery and processes to help us save energy and increase the efficiency of our production processes. When considering the various options available to us, we strive to select the most economical solutions to improve energy efficiency and reduce our energy consumption. One effective way of saving energy is switching to

LED lighting and motion detectors, and even daylight-dependent lighting, on our site in Uedem. By installing heat exchangers in 2018, we were able to significantly reduce the amount of gas we use.

By raising awareness, motivating and training our employees, we can make sure they're aware of the climate impacts of CO₂e emissions and how to use energy more consciously. We also encourage our suppliers to report on their energy efficiency and CO₂e emissions and make efforts to improve them.

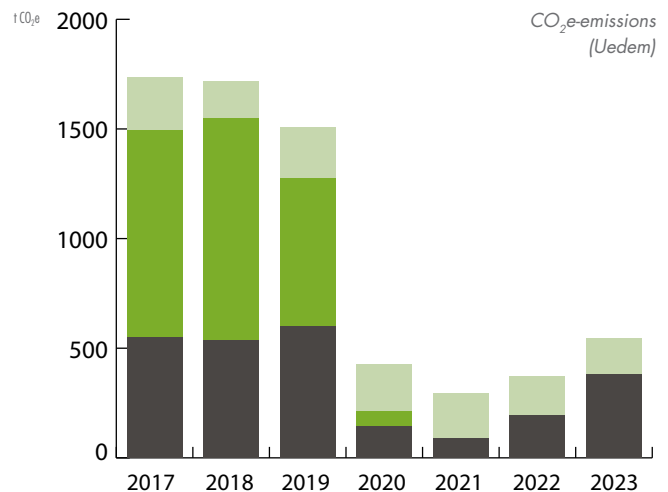
Switching to renewable energies is very important to us, which is why we've installed a photovoltaic system on our logistics facility. A large proportion of the energy requirements of our heat pumps, used to heat the buildings in winter and cool them in summer, is covered by this self-generated electricity. We've also achieved further CO₂e savings by purchasing renewable energy.

METRICS

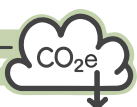
CO₂e-emissions

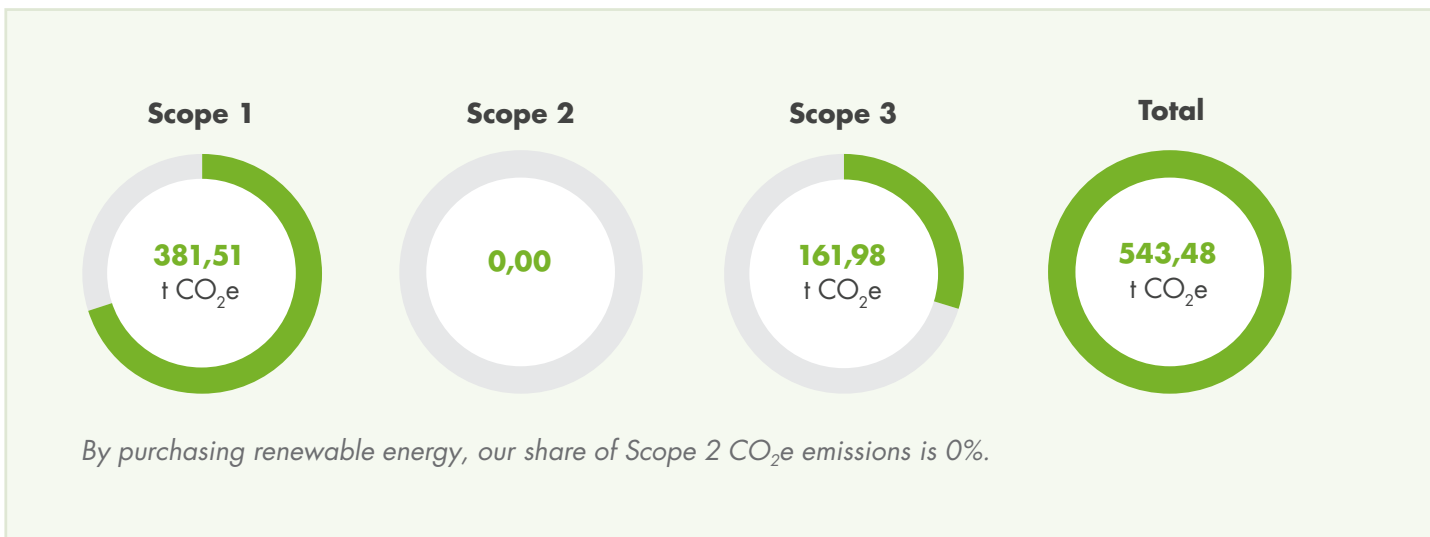
We were able to significantly reduce our corporate carbon footprint (CCF) in accordance with Scope 1 and Scope 2 emissions from 1,493 tons of CO₂e in 2017 to just 90 tons of CO₂e in 2021. In 2023, that value increased to 382 tons of CO₂e. This increase can be explained by our greater use of fuel following the Covid pandemic.

As well as our CCF, we're also working intensively on our product carbon footprint (PCF). We are currently in the data collection phase, with the aim of being able to specify the PCF for our products in the near future.



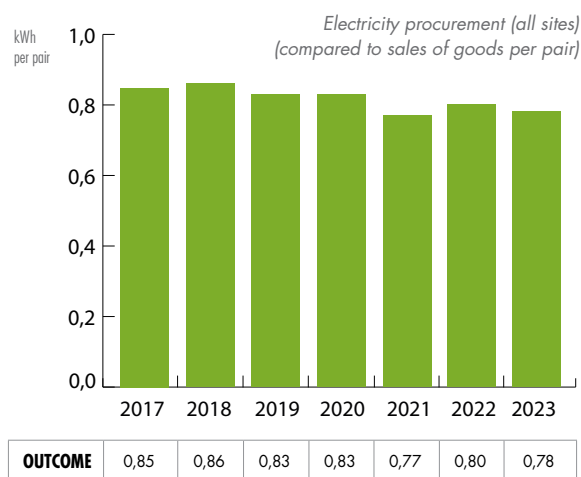
	2017	2018	2019	2020	2021	2022	2023
CO ₂ e SCOPE 3	246	169	232	219	202	174	162
CO ₂ e SCOPE 2	942	1.013	678	65	0	0	0
CO ₂ e SCOPE 1	551	536	599	146	90	198	382





Electricity consumption

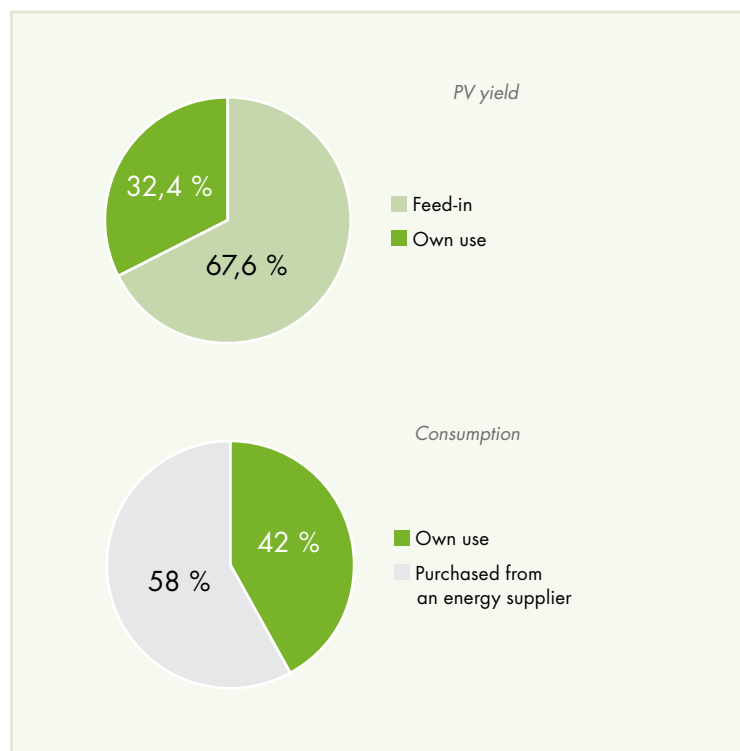
Thanks to the aforementioned energy saving actions applied across ELTEN GmbH sites, we were able to reduce our average electricity procurement from 0.85 kWh per pair in 2017 to 0.78 kWh per pair in 2023.



Photovoltaic system

We've installed a photovoltaic system on our logistics facility, which – following an upgrade – has provided a total output of 938 kWp (kilowatt peak) since June 2023. In 2023, we were able to achieve a self-produced energy yield of 748 MWh. We used 32.4% of this energy ourselves, while the remaining 67.6% was fed into the national grid. Feeding energy into the grid like this does not count towards our CO₂e audit.

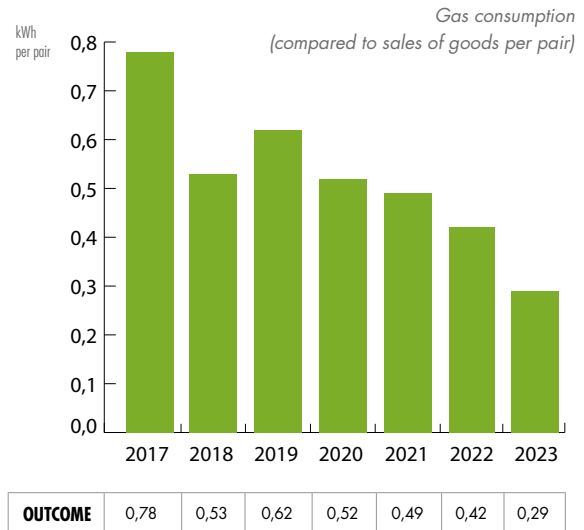
By generating our own energy like this, we've been able to cover 42% of the electricity requirements of our logistics and production site. We cover the remaining requirements by purchasing energy from an energy supplier.



Gas consumption




We have significantly reduced our energy consumption through targeted use of unavoidable internal waste heat. With the help of heat exchangers, we use the waste heat generated to heat our site and therefore significantly reduce our CO₂e emissions. Since this system was first installed back in 2018, a significant proportion of the natural gas consumption on our main production site in Uedem has been avoided entirely. Two existing gas heating systems have been taken out of operation altogether.


We were also able to significantly reduce gas consumption at our logistics site by switching to heat pumps for heating in 2023.






TARGETS


Key topic: Reducing greenhouse gas emissions

 Objective	 KPI	 Actions
Scope 1: Reducing CO ₂ e emissions to 340 tons per year Scope 2: Maintaining 0 tons of CO ₂ e emissions per year Scope 3: Reducing CO ₂ e emissions to 100 tons per year	<ul style="list-style-type: none"> Total greenhouse gas emissions in tCO₂e per year 	<ul style="list-style-type: none"> Creating a CO₂e balance sheet Introducing energy-efficient processes and technologies Encouraging the use of renewable energies




 **Timescale:** By the end of 2024


Key topic: Use of renewable energies

 <p>Objective</p>	 <p>KPI</p>	 <p>Actions</p>
<p>Using more than 95% electricity from renewable resources on all our own sites.</p> <p>Reducing gas consumption by 70% taking 2020 as the base year.</p>	<ul style="list-style-type: none"> ■ Share of renewable energy in % ■ Energy consumption in kWh (gas) 	<ul style="list-style-type: none"> ■ Installing a PV system on our Molkereistraße site (938 kWp) ■ Introducing energy-efficient processes and technologies ■ Regularly investigating new opportunities to use renewable energies

 **Timescale:** By the end of 2025

Key topic: Increasing energy efficiency, reducing energy consumption

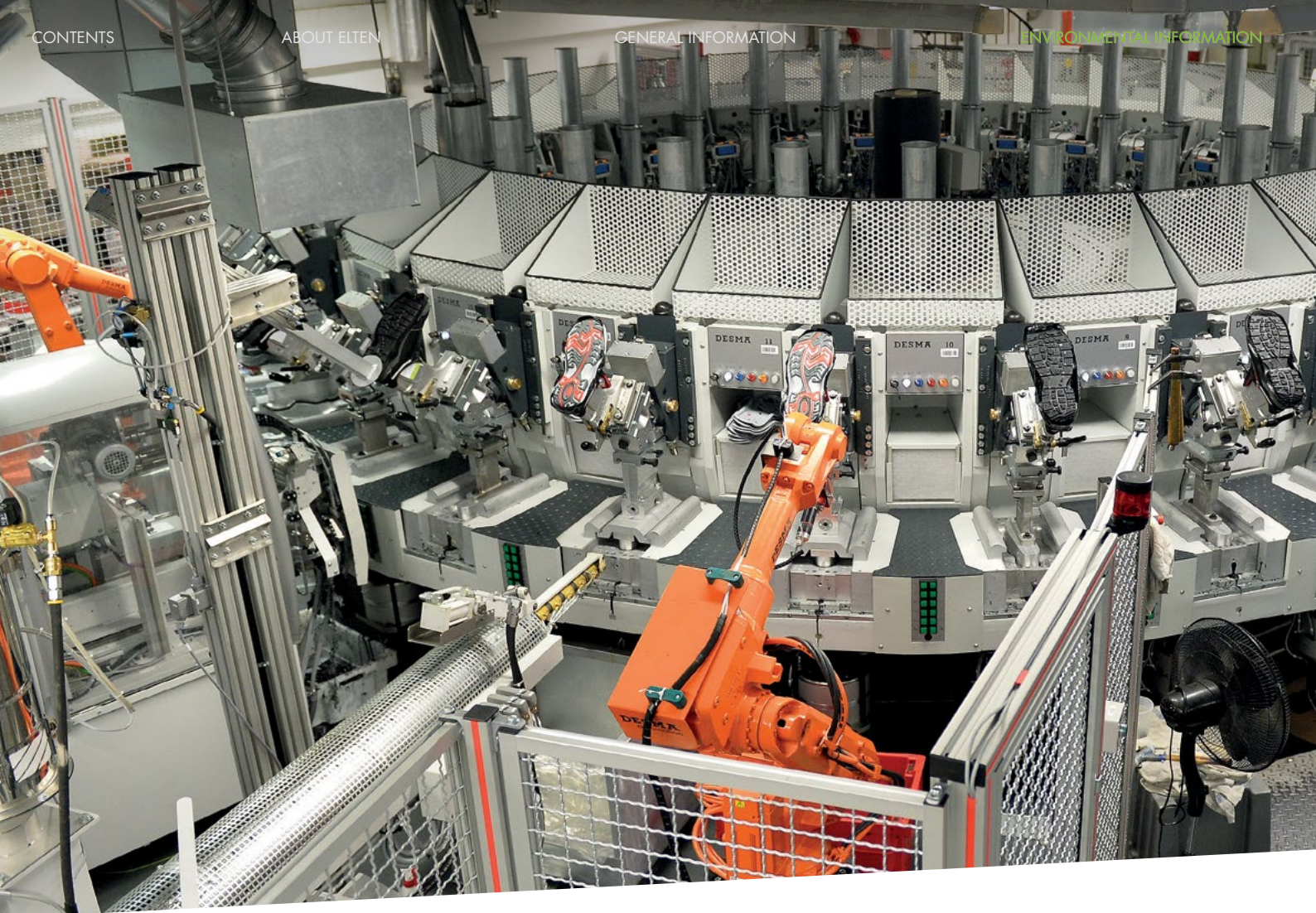
 <p>Objective</p>	 <p>KPI</p>	 <p>Actions</p>
<p>Training 100% of our office employees in energy efficiency</p>	<ul style="list-style-type: none"> ■ Proportion of trained employees in % 	<ul style="list-style-type: none"> ■ Continually investing in more energy-efficient technologies ■ Promoting and raising awareness among employees of more conscious use of energy

 **Timescale:** By the end of 2024

Our climate actions are related to the following Sustainable Development Goals:



- **12.2:** Achieve the sustainable management and efficient use of natural resources.
- **13.1:** Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries
- **13.2:** Integrate climate change measures into national policies, strategies and planning.



ENVIRONMENTAL PROTECTION

IMPACTS, RISKS AND OPPORTUNITIES

Protecting natural resources and reducing our environmental footprint are extremely important to us. We see resource conservation and more efficient use of resources as an opportunity to increase the efficiency and productivity of our company. By using alternative raw materials, we can avoid resource shortages, in addition to allowing us to generate recyclable products.

We also communicate to the outside world that we manufacture our products in environmentally-friendly conditions. Customers and other stakeholders appreciate our commitment to all things environmental protection, and this pays dividends, among other things, through increased customer satisfaction and loyalty. Demonstrating our environmental protection credentials in the form of certifications also boosts our competitiveness, our market position and our corporate image.

We take protecting the environment from potential contamination by hazardous substances extremely seriously. The production processes involved in our value chain carry various risks. For example, the risk of soil pollution or contamination due to production waste, wastewater, and the use of chemicals. The uncontrolled release of hazardous substances and chemicals can have serious consequences. We comply with all the legal requirements on environmental protection as a matter of course, though our measures typically go well beyond them. This gives us the security of being able to avoid negative environmental impacts and subsequent legal ramifications.

POLICIES AND ACTIONS

At ELTEN, we've developed innovative strategies and introduced a range of different actions to ensure the greatest possible levels of environmental protection. In particular, this includes constantly reviewing and adjusting our production processes in order to optimise our machinery, systems and technologies, so that we can



achieve maximum product quality, as well as energy and resource efficiency. Developing new products and processes plays a key role here.

As part of our production processes, we work with state-of-the-art production technology from global market leader DESMA. Their machines are long-lasting and focused on both energy- and material efficiency.

As a machinery manufacturer, DESMA is a partner member of the German Machinery and Equipment Manufacturers' Association (VDMA) sustainability initiative. The majority of ELTEN's outer soles are directly moulded using a DESMA soling machine, rather than being glued on. That's one way in which we're now working more precisely and sparingly when it comes to use of materials. Thanks to modern machinery, we can do without adhesives, especially solvent-based adhesives, when moulding. For applications that do require adhesives, we only use hot melt or water-based adhesives, except for specialist applications.

Increased expertise and knowledge in the fields of environmentally-friendly production and resource efficiency are gained through the exchange of best practices, experiences and innovations with other companies and organisations.

Our company is ISO 14001 certified. This environmental management system helps us achieve high environmental standards.



We make our employees aware of how to use water – a highly valuable resource – responsibly. ELTEN GmbH's water consumption plays only a minor role, as we only use water for sanitary facilities, to maintain our green spaces and provide drinking water on site. No water is required for actual production processes.

When handling substances and chemicals of concern, we proceed with particular caution and ensure high standards are maintained. We ensure soil protection is incorporated in all relevant business practices and decisions. Substances of concern are stored properly in clearly marked containers and only ever disposed of by certified waste disposal companies. We address the issue of waste in more detail in the [Resource use and circular economy](#) topic.

We only work with high-quality, long-lasting raw materials.

The high quality of our products helps reduce wastage. A long-life product is consumer-friendly and puts significantly less strain on people's wallets and the environment over the years than shorter-life products.

In order to guarantee the best possible environmental protections in our value chain and products, we have as much confidence in our excellent standards as we do in our partnerships. Our [LWG](#) and [cads](#) memberships are testament to this approach.

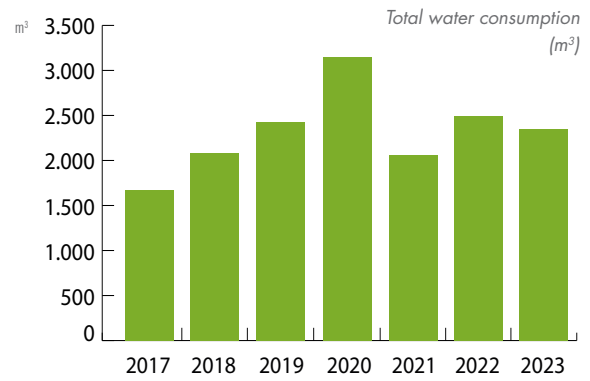
METRICS AND TARGETS

Water consumption

The increase in water consumption between 2018 and 2020 can be explained by the expansion of our facilities and maintaining our green spaces, which involved more water consumption due to low rainfall.




Certified leather production


In 2023, the share of leather we procured from tanneries audited in accordance with the LWG protocol was already over 90%.



OUTCOME	2017	2018	2019	2020	2021	2022	2023
	1.669	2.087	2.427	3.146	2.055	2.494	2.353

Key topic: Reducing environmental impacts, preserving biodiversity

Objective	KPI	Actions
 1. Compliance with all environmental regulations and standards 2. Increasing the share of leather sourced from LWG-certified tanneries to 100%	 1. Total number of reported incidents 2. Leather used in %	 1. Environmental management system 2. Procurement guidelines with specifications on buying leather from LWG-certified tanneries

 **Timescale:** 1. Ongoing 2. By the end of 2025

Our environmental actions are related to following Sustainable Development Goals:



- 3.9:** By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.

agreed international frameworks, and significantly reduce their release to air, water and soil (...).
- 12.2:** Achieve the sustainable management and efficient use of natural resources.

12.5: Substantially reduce waste generation through prevention, reduction, recycling and reuse.
- 12.4:** Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with

agreed international frameworks, and significantly reduce their release to air, water and soil (...).



RESOURCE USE AND CIRCULAR ECONOMY

IMPACTS, RISKS AND OPPORTUNITIES

Circular economy means an economic system in which the value of products, materials and other resources in the economy is maintained for as long as possible, enhancing their efficient use in production and consumption, thereby reducing the environmental impact of their use, minimising waste and the release of hazardous substances at all stages of their life cycle, including through the application of the waste hierarchy.

It's also an opportunity to lower energy consumption and reduce greenhouse gas emissions. By extending a product's life cycle, as well as recycling and reusing products, resources can be conserved. Circular economy also promotes new ideas and technologies, and even facilitates brand new business models and services. Companies can become more competitive and boost their reputations. However, the required developments and technologies are still in their infancy, and a certain amount of investment is needed for companies to establish themselves in this sector. Furthermore, specific industry, product and material considerations are a necessary prerequisite to being able to predict the effects, benefits and drawbacks of solutions as precisely as we'd like.

Using recycled materials or designing recyclable products isn't necessarily always the best solution when it comes to sustainability. When using recycled materials, there can be no room for compromise in terms of a product's quality or its lifespan. A critical analysis of the materials being used and sustainable product design is crucial, which also helps rule out any

reductions in quality. Products should be designed so that they can be easily reused or recycled. In the world of food protection, there are certain limits in terms of using recycled materials and recyclability, given food protection standards come with strict quality and testing requirements.

Circular economy is complex, and implementing a circular model requires close cooperation with suppliers, customers and other stakeholders. There is also regulatory uncertainty to consider, due to new and upcoming legislation and specifications.



POLICIES

Preventing waste and waste disposal are very important to us. At ELTEN, we've developed a comprehensive waste management in line with the waste hierarchy, in order to contribute to protecting the environment. Avoiding waste generation in the first place is the most important part of that policy. Wherever there is waste, we ensure it is disposed of in an environmentally-friendly way. Foot protection is an important part of many professionals' personal protective equipment, helping to ensure occupational health and safety. We also take into account the environmental impact of these products' disposal once they've reached the end of their useful lives.

In order to minimise the effects of incineration, we use environmentally-friendly materials and production processes. Using recycled materials is just one way in which we're reducing the environmental impact of shoes. At ELTEN, we also rely on resource-efficient production processes to help keep energy and resource consumption as low as can possibly be.

An important factor in minimising environmental impacts at the end of a foot protection's useful life is the possibility of reusing or recycling. We're working closely with our partners to establish recycling processes, while developing and producing recyclable models.

In order to strengthen resource efficiency, we follow the principle of sourcing and using materials that are as long-lasting as can be, helping us make products that offer extended useful lives.

By developing technologies and materials that facilitate a longer useful life, we're helping to ensure fewer shoes get disposed. This reduces the amount of resources being used to produce new shoes, as well as the associated environmental impacts. We also carry out extensive testing and certification to ensure the materials used to produce our shoes meet strict environmental and safety standards. This testing and certification ensures shoes are safe and environmentally friendly, which contributes to a more sustainable working world.

It's important to mention that disposing of shoes is not just the responsibility of the manufacturer. Consumers also have an important role to play in disposing of their shoes properly or making use of reverse logistics. By making conscious decisions when choosing and wearing shoes, as well as properly disposing of or returning them, consumers can help reduce the environmental impacts of using and recycling our products.

In order to ensure our products are manufactured in ethical and environmentally-friendly conditions, it's important that we know about the origins and life cycles of our products and raw materials. One important aspect of this is understanding the components used in our products.

We carefully and systematically collect detailed information about the materials used in our products. Transparency and accuracy are very important to us.

Among other things, we collect data on:

- Types of materials
- Levels of recycled content

And we use this data to:

- Monitor and improve the sustainability and due diligence of our supply chains
- Assess and improve our choice of suppliers
- Inform our customers about the origins and life cycles of our products
- Calculate product carbon footprints for future [digital product passports](#) and therefore meet the requirements of upcoming legislation

We're committed to taking these requirements into account when collecting data and using information about our materials. We expect our suppliers to provide similarly accurate, up-to-date information about the materials they use.

Recycled materials

Using recycled materials doesn't just help reduce the amount of materials we consume, but also the amount of waste and CO₂e emissions we produce.

In order to make a positive contribution, it's therefore important for us to integrate as many recycled materials as possible into our products. This includes, for example, using recycled materials for our soles and using recycled textiles.

We carry out regular testing to continuously improve our use of recycled materials. This helps us assess the effectiveness of actions already put in place and optimise our use of recycled materials in production. To do so, we work closely with our suppliers and recycling experts.

ACTIONS

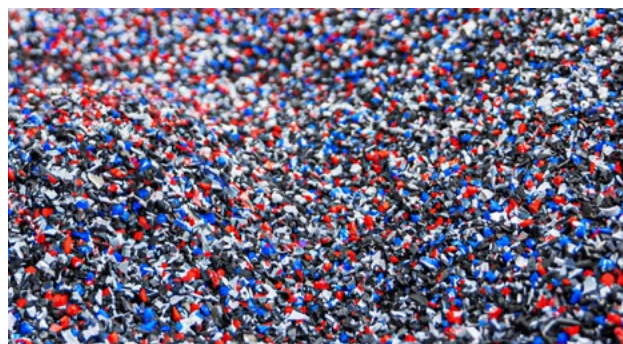
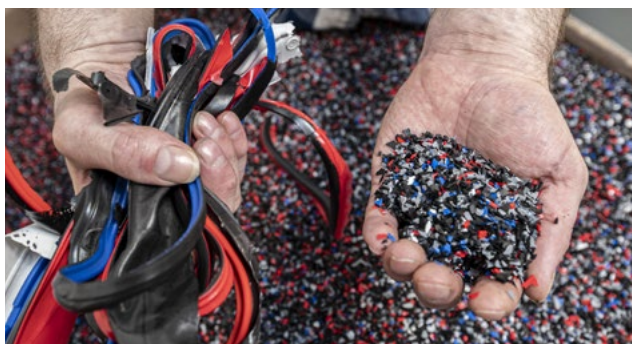
We've introduced various measures to reduce waste. For example, using recycled packaging and materials helps reduce packaging waste.

FSC packaging

ELTEN GmbH uses shoe boxes for the ELTEN brand that meet FSC Recycled Standard. The "FSC Recycled" label stands for products that only contain recycled material. The outer packaging of the ELTEN brand complies with FSC Mix Standard. This means that in production, materials from FSC-certified forests and / or recycled material as well as material from controlled sources are used.

When disposing of unavoidable waste, we apply our comprehensive waste separation strategy. Different waste containers are provided for different types of waste, such as paper, plastics or metals. There are also separate containers for hazardous waste, such as chemicals or oils, where it can be collected before being disposed of properly.

We regularly analyse our production processes to identify waste streams and find new ways of reducing waste. We keep material residue and offcuts created when producing our shoes to a minimum. As far as possible, we return PU and TPU production waste directly to the production process. We give away any remaining quantities to our partners, who use them to create new products, such as insulation.



Produktionsabfall als Feststoffzudosierung der Zwischensohle

We analyse our materials and products in conjunction with their respective impact assessments to help reduce our reliance on primary raw materials and opt for recycled materials instead, wherever possible. One example of best practice is our high recycled content collection. We've been able to produce seven models with linings made from 75%-recycled material and laces and inlay soles made from 100%-recycled material. In our overall production, we also use laces, perforation resistant inserts, inlay soles, heel caps, inner linings and other components that contain recycled materials.



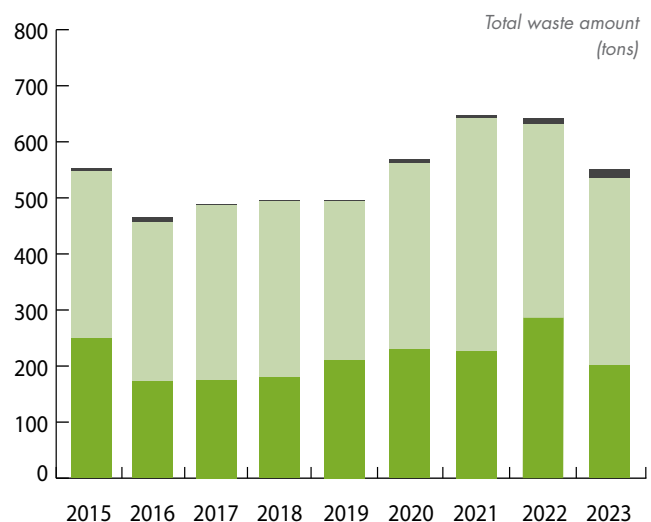
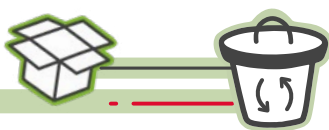
We work closely with external partners and suppliers as part of various research projects to identify environmentally-friendly and marketable recycling solutions for our shoes once they come to the end of their useful lives.

We regularly review the quality and cost-effectiveness of chemical and mechanical recycling processes. Given to various challenges involved, as yet, no marketable solution exists. Among other things, one of the biggest

hurdles is cleanly separating processed raw materials and collecting the remaining quantities of pure products. A loss of quality is also sometimes a possibility. That's why we're constantly reviewing the extent to which our use of primary raw materials needed to meet quality and regulatory requirements can be reduced. We see circular economy as one of a number of relevant approaches to sustainability. In 2023, we pushed ahead with various projects and will continue to pioneer research into marketable recycling solutions together with our partners.




METRICS AND TARGETS

In 2023, we significantly reduced our total amount of waste compared to the previous year. This reduction of almost 30% of mixed municipal waste (waste code 200301) was achieved by recycling PU and TPU production waste.



■ HAZARDOUS	4	11	1	2	3	8	6	11	16
■ RECYCLABLE	299	283	312	314	282	331	415	345	335
■ NON-HAZARDOUS	249	173	175	180	211	230	227	286	201

Key topic: Increasing the proportion of recycled materials used (recyclate)

 <p>Objective</p>	 <p>KPI</p>	 <p>Actions</p>
<p>Increasing the proportion of recycled materials being used across our collections to produce uppers, soles and inlay soles</p>	<ul style="list-style-type: none"> ■ Proportion and total amount of recycled materials used 	<ul style="list-style-type: none"> ■ Use of recycled PES ■ Use of recycled PES, plus fleece made from cutting waste ■ Use of recycled PU components

 **Timescale:** By the end of 2024

Our actions in terms of resource use and circular economy are related to following Sustainable Development Goals:



- **12.2:** *Achieve the sustainable management and efficient use of natural resources*
- **12.4:** *Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil (...).*
- **12.5:** *Substantially reduce waste generation through prevention, reduction, recycling and reuse.*
- **12.6:** *(As) companies, (...) to adopt sustainable practices and to integrate sustainability information into their reporting cycle.*
- **17.16:** *Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries.*
- **17.17:** *Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.*

CIRCULAR ECONOMY AND RECYCLING - AN INTERVIEW WITH HELGA SURMANN

Q: ELTEN revealed a number of policies about circular economy last year. What new developments have there been since then?

A: In 2023, we were on the lookout for new materials with recycled content we could use to increase the overall recycled content of the materials we use. For new developments in particular, we check whether higher proportions of recycled materials can be used.

We've gone further with solids dosing and successfully introduced it in our own production processes. That's when different plastics are shredded and returned to production as solid substances. 100% of the remaining white TPU is returned to production, while some coloured PU can be reintegrated into our production processes, and other parts are sold on to partner firms to be used to make new products, like insulation materials. We're also looking into chemical recycling options and working on various other pilot projects.

On one project, we've been looking into whether cutting waste from the upper production process can be reprocessed into new upper materials. We've been collecting cutting waste, shred it and turned it into a new base material using the recycled fibres. This can then be used for laminating upper materials or as an upper, meeting the standard requirements.

On another project, we've been shredding workwear worn by employees at a Dutch airport, spinning it into thread and then weaving it into new textiles. Once covered with the base material from cutting waste, these textiles could be used as shoe upper material

Q: What opportunities do you think these projects will bring to ELTEN?

A: Generally speaking, ELTEN benefits from these pilot projects because they open up new opportunities, improve our knowledge and strengthen our network. More specifically, these projects bring tangible benefits. For example, if we implemented the fleece project, we'd be establishing a genuine small materials circular economy, helping ELTEN avoid waste and save resources.



Engineering graduate
Helga Surmann works
in product management
part of the cross-departmental
team that oversees all of
our recycling projects.

Q: What are the limits to recycling projects in foot protection?

A: A significant challenge when it comes to implementation is that certain minimum quantities have to be produced and signed off by our upstream suppliers so that the processes can be profitable and therefore marketable. This hasn't been the case so far. Coming together with other companies or industries could be a sensible next step here.

In foot protection, it's also important we pay close attention to the fact that protecting our consumers is our top priority. Any loss of quality due to increased recycled content must be avoided at all costs. Materials have to meet the standard requirements of industry and be just as durable as non-recycled ones, because making shoes with a shorter lifespan wouldn't exactly be in the spirit of sustainability.

graduate
works for us
ment. She's
departmental
and promotes
projects.



The price/performance ratio also has to be right. Foot protection pricing doesn't allow for major increases, so products with recycled content can't be allowed to cost significantly more than the same products without recycled content.

Q: What are your goals for 2024/2025?

A: Generally, we want to continue exploring our options for increasing our recycled inputs without compromising on quality. Working with partners, we'll also be looking into how we can further process used shoes – mechanically and chemically.

More specifically, we want to investigate and, if possible, expand the solids dosing in our production processes to other products. And the majority of our shoes should come with inlay soles made from 75%-recycled content.

Q: How are you preparing for the digital product passports coming in with the upcoming legislation?

A: Digital product passports are an exciting and important development for us. In order to create a basis, we are currently collecting data, which is proving to be extremely time-consuming, but we're getting there!



*A **digital product passport** contains all the relevant information about a product and can be viewed by consumers. This makes it easy for them to see what a product is made from in more detail, and where its individual components come from. Use of resources, such as water and energy consumption, as well as emissions, must also be presented transparently.*

SOCIAL INFORMATION

Social responsibility is a fundamental part of sustainable development and our corporate culture. We focus on social factors that can influence the wellbeing of people and communities. We strengthen social justice, equal opportunities and the protection of human rights, both in our own business operations and as part of our value chain.

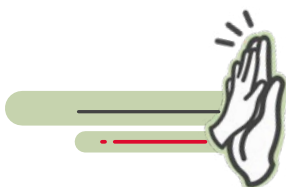


OWN WORKFORCE

IMPACTS, RISKS AND OPPORTUNITIES

Secure employment

Safe working conditions meet our employees' needs for good jobs with potential for development, and lead to increased motivation and job satisfaction. This is the basis of our safe working conditions with qualified workers, and therefore also for securing the future of our business. These relationships guarantee our ability to plan for the long term, maintain long-term performance, ensure the quality of output, and provide the space for innovation. They are what allows our company to be more adaptive to market demand.



Despite the high basic costs of employing skilled workers, ELTEN production still takes place in Germany as an industrial hub because of our company's history and intrinsic beliefs.

Employing qualified and motivated workers is also very important for external stakeholders. It strengthens trust in the quality of our products and in the company itself, demonstrating stable and sustainable business development. The image portrayed by satisfied employees also strengthens our ability to position the company as an attractive option for potential applicants.

Comprehensive training and development are excellent ways of furthering our employees' skills and specialist knowledge. Given the general shortage of skilled



workers, and the fact that ELTEN's catchment area is limited due to the local infrastructure, fostering younger talent is a key area of focus. Staff development helps build a qualified workforce, secures long-term expertise, promotes a culture of learning and ensures a constant transfer of knowledge. It means loyalty to the company can be strengthened, workforce performance can be secured in the longer term, and we can adapt to ever-changing market conditions.

Health and safety

Employees have the right to a safe workplace and to be able to trust their employer in this regard. Our company's high occupational health and safety standards not only serve to reduce costs by reducing absenteeism in relation to employee health and safety matters, but companies that take comprehensive care of the safety of their employees and fulfil their obligations also see increased motivation, commitment and creativity within the workforce, which can lead to greater efficiency and

productivity. In the longer term, this can help secure and even increase a company's success. It's also an opportunity to boost skills and knowledge in relation to occupational safety, for example, by sharing best practices and experiences – even innovations – with other companies or organisations on the topic of employee health and safety.

“Preventing accidents shouldn't be seen as a requirement of the law, but as a requirement of human obligation and economic reason”.

Werner von Siemens, German inventor, electrical engineer and industrialist, 1880

Fair treatment and equal opportunities

Discrimination can limit access to qualified workers and damage reputations. By embracing diversity and an inclusive corporate culture, we can improve employee loyalty, employer branding and cohesion within our teams. It's also an opportunity to increase our appeal as an employer by attracting, developing and promoting a diverse range of talent.

A diverse workforce can improve our understanding of different customer groups and expand market opportunities, alongside strengthening our innovation and creativity. This can contribute to our long-term security and increase our overall success. An increased commitment to diversity and inclusion also boosts our prospects of becoming more attractive to customers and other stakeholders, as they increasingly favour companies that promote diversity and foster non-discriminatory work environments.

Committing to diversity can strengthen our company image, while also improving our competitiveness and market success, as it allows us to better adapt to the needs and wishes of a range of customers. Those who encourage diversity at all levels are more successful when it comes to fulfilling both the legal and voluntary requirements and guidelines on diversity and inclusion in the workplace. Practical steps to improve equal opportunities within the workforce and at management level, regardless of gender, can lead to positive outcomes. For example, increasing our pool of skilled workers and improving our company's reputation.

POLICIES AND ACTIONS

We believe everyone has the right to be treated fairly. We are aware that labour and human rights play an important role in our day-to-day business, and that it's our responsibility, to ensure these rights are respected and protected.

ELTEN is committed to offering all our employees a safe and healthy working environment where they can develop their skills and potential. We believe that promoting diversity, inclusion and equality isn't just morally right, but also helps create a positive work environment, where all employees can feel welcome and valued.

We're committed to providing appropriate working conditions, including fair remuneration, decent working hours and protection against discrimination. For us, respecting the dignity of our employees is very important, and we're committed to ensuring they have access to training, healthcare and adequate social security. We actively support the development and promotion of their skills and strive to offer them equal opportunities and personal growth.

ELTEN GmbH is committed to comply with human rights in the workplace. We operate in accordance with all applicable national and international laws and regulations on protecting workers' rights.

The health and safety of our employees is very important to us, and we take steps to ensure that our workplaces meet the highest standards.

We actively promote freedom of association and the formation of a works council to ensure the rights and interests of our employees are properly represented. We recognise the importance of collective bargaining and are open to dialogue and cooperation with trade unions.

We understand that compliance with labour and human rights is an ongoing process that requires regular reviews and improvements. As such, we regularly review and update our policies and processes to ensure we're meeting the highest standards and providing the best possible working environments for our employees. Our corporate culture is based on respecting the rights of every individual. This not only helps create a positive working environment, but also ensures all our employees can play an active role in implementing our labour and human rights policies, supporting us in identifying and resolving problems.

At ELTEN, we believe a safe and healthy work environment is the basis of a positive and productive work environment.

Our commitment to reducing and excluding negative practices when it comes to working conditions forms an integral part of our social responsibility. By regularly reviewing and adjusting our operations, we strive to minimise risks and ensure the highest possible standards. Our production facilities aren't just assembly lines, but rather centres of safety. We use state-of-the-art technology and processes to continuously improve working conditions. Ergonomic design, regular training and open communication help promote awareness of health and safety in the workplace.

We're also proud that we not only meet legal standards, but exceed them. We're committed to ensuring all ELTEN employees have the right to work in fair and safe conditions. This includes protecting them against all forms of discrimination, harassment and exploitation.

We want to establish a culture of care and respect, where every individual is part of a safe and healthy working environment.

In order to provide fair remuneration, we offer a performance-based and transparent remuneration system. We adhere to all applicable collective bargaining agreements and offer both voluntary benefits and those that exceed collectively-agreed rates, as well as asset-creating benefits and a company pension scheme, in addition to collectively-agreed benefits.



Depending on the role in question, we offer flexible working hours and remote working opportunities, enabling our employees to profit from a good work life balance. We support our employees with allowances for childcare fees, making it easier to combine work and family life. We also encourage our employees' professional growth by supporting them with specialist training. Our employees also receive gift vouchers as an additional benefit. We organise regular prize draws for (sporting) events organised by the teams we sponsor to reward our employees with special experiences.

We offer comprehensive health and social security benefits and regularly carry out risk assessments to identify, analyse and assess potential threats to the health and safety of our employees. As such, we take steps to reduce and prevent health and safety risks, for example, providing personal protective equipment, improving workplace design, applying ergonomic principles, complying with hygiene and safety regulations, as well as implementing regular inspections and maintenance. In order to improve the wellbeing of our employees, ELTEN offers a wide range of support. For example, we've launched regular exercise programmes and give our employees access to physiotherapy.

We also offer nutritional advice to support colleagues in adopting a healthy diet and regularly offer free vaccinations. We speak openly about safety measures to raise awareness among our employees and provide a safe working environment. We also carry out regular training and awareness-raising sessions on occupational health and safety measures, anchoring the concept of the importance of occupational health and safety within our workforce.

We provide apprenticeships in various parts of our business to foster young talent and train them up to become skilled workers. By offering both internal and external qualifications, we help skilled workers continuously improve their knowledge and expertise.

Our training and development programmes are tailored to the needs of individual employees and are designed to promote both professional and personal skills.

By offering an extensive variety of internal and external learning opportunities, including seminars, workshops, e-learning, mentoring and coaching, we give our employees a wide range of opportunities for personal growth.

We also work with external training providers to ensure our employees are always up to date with the very latest specialist expertise and can be exposed to best practice ideas for their specific work environments. We carry out regular feedback discussions to assess the effectiveness of our training and development programmes, and to ensure they're meeting the needs of employees.

We foster a work environment that promotes diversity and inclusion. At our company, we adhere to a strict policy of equal opportunities when recruiting, promoting and setting salaries, regardless of gender, ethnic background, religion, sexual orientation, or any other protected characteristics. Our CSR Policy is designed to support all ELTEN GmbH employees in maintaining and improving an ethical approach to all aspects of company life. It's important to us that our CSR Policy isn't just words on a piece of paper, but that it's put into practice in every aspect of our business.

METRICS AND TARGETS

2020-2023 number of employees full-time equivalent (FTE) as of 31.12.2023



2023 figures as of 31.12.2023

352 FULL-TIME*	37 PART-TIME*	6 TEMPORARY*	9,57 average years of service	44 average age
158 women in total workforce*	3 out of 17 managers are women*	16 employees with disabilities*	16 apprentices*	15 nationalities
10 accidents in the workplace (2023)**	0 accidents while commuting (2023)**	0 fatal accidents (2023)**	<p>* Headcount ** ELTEN GmbH compiles accidents statistics with days lost for accidents in the workplace and while commuting. Accidents with more than three lost days must be reported and passed onto our employer liability insurance association.</p>	



Key topic: Inclusion, diversity and equality in relation to human resources decisions



Objective

Human resources decisions will continue to be made solely on the basis of an individual's qualifications



KPI

- Comparing job specifications with applications
- Level of successful performance



Actions

- Code of Conduct
- Photoless applications
- Comparing job adverts with applicant profiles



Timescale: Ongoing

Key topic: Preventing accidents in the workplace (occupational health and safety)



Objective

Reducing the number of accidents in the workplace from 6 as of the 2022 base year to 0



KPI

- Number of accidents



Actions

- Carrying out safety inspections
- Instructing employees on how to work safely
- Health and safety training



Timescale: By the end of 2025

Key topic: Filling apprenticeship places



Objective

At least one person for every apprenticeship role at ELTEN GmbH, excluding media design, IT specialists every three years



KPI

- Number of apprentices per department



Actions

- Advertising apprenticeship places
- Attending apprenticeship fairs
- Attending apprenticeship night in Uedem
- Offering work experience as a first step



Timescale: By the end of 2025

Our actions in terms of our own workforce are related to the following Sustainable Development Goals:



- **3.8:** Achieve universal health coverage, including financial risk protection, access to quality essential health-care services (...).
- **8.5:** Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.
- **8.7:** Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.
- **8.8:** Protect labour rights and promote safe and secure working environments for all workers (...).



Employees working for our partner in China.

WORKERS IN THE VALUE CHAIN

IMPACTS, RISKS AND OPPORTUNITIES

Responsible supply chain management protects labour rights and promotes fair working conditions. It can reduce the risk of reputational damage and boycotts, strengthen a company's reputation, and boost both customer and employee satisfaction and loyalty. Many stakeholders expect companies to ensure ethical procurement practices and decent working conditions.

At the same time, sustainable procurement practices and stable supplier relationships help minimise the risk of human rights violations and process interruptions. By complying with the legal requirements and international standards on social commitment and responsible supply chains, companies can secure their businesses for the long term. Trust in suppliers – and in other workers in the value chain – can also be strengthened. This directly affected stakeholder group has a major

interest in fair remuneration, social dialogue, freedom of association, fair treatment and equal opportunities, as well as compliance with human rights. Particularly in labour-intensive supply chain processes outside of Europe, the risk of labour and human rights violations can be a concern. Making our value chain transparent is a fantastic opportunity to uncover any potential abuses. However, this is a costly process that involves a great deal of work. Possible cultural differences between suppliers and political circumstances in sourcing countries – especially outside of Europe – need to be taken into consideration. This can lead to challenges in finding a common approach with suppliers.



POLICIES AND ACTIONS

As one of the leading manufacturers of safety footwear, we're keenly aware of our role in society and our responsibilities to respect labour and human rights and sustainable business practices. We're committed to preventing, mitigating and remedying the adverse impacts caused by or related to our business operations. Our sustainable procurement practices are based on social responsibility and sustainable supply chain management.

We only work with suppliers who demonstrate social responsibility and create fair working environments for their employees. We ask all our suppliers to adhere to the same principles of sustainability as we do.

In our [Code of Conduct](#) we commit to respecting and protecting labour and human rights. These cover a variety of topics, including prohibiting child labour, forced labour, discrimination, unfair working conditions, and guaranteeing fair remuneration. Our suppliers must recognise our Code of Conduct in full.

We enjoy long-standing and trusting relationships with our suppliers and business partners. It's particularly important to us that we maintain an open dialogue – including face-to-face in our production countries – about how we can optimise working conditions. That's one reason why we also promote on-site training for our suppliers.

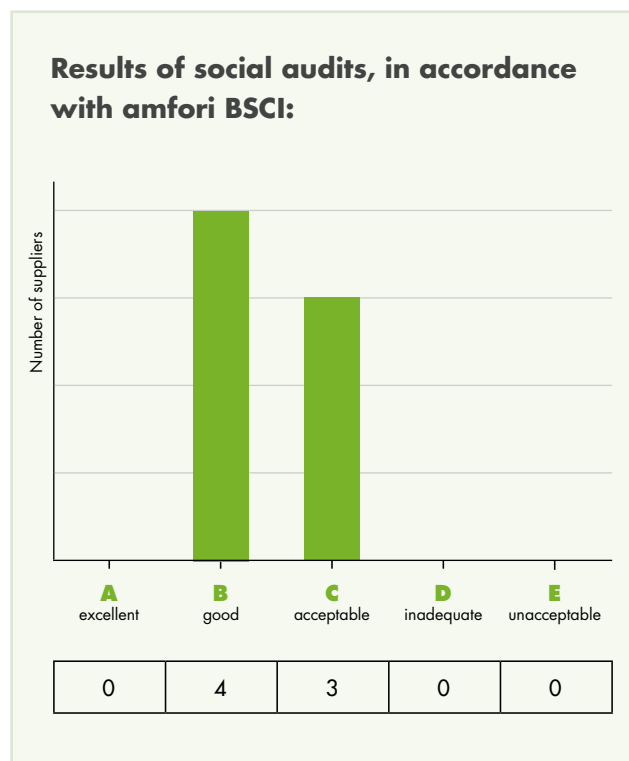
In line with our amfori BSCI membership, we also carry out regular on-site CSR audits of our suppliers. These social audits are risk analysis tools that we use to verify whether ELTEN GmbH's Code of Conduct – based on the criteria of the amfori BSCI Code of Conduct – is being adhered to.

In the 2023 reporting year, ELTEN carried out a risk analysis of social standards in our supply chain based on the amfori BSCI "country risk classification". Suppliers presenting potential risks were audited in accordance with amfori BSCI principles. No violations

of labour rights or human rights, conflicts of interest, corruption, fraud or bribery were identified either at ELTEN GmbH or in the CSR audits carried out in accordance with the amfori BSCI assessment criteria among our suppliers in 2023. The ultimate goal of these principles is to sustainably improve social standards within our supply chain.

In order to have more control over any significant negative impacts on workers in the value chain and prevent them, we run our own production facilities in Europe and in Germany. This way, we're also contributing to strengthening Europe, and particularly Germany, as a place to do business where on-time deliveries can be guaranteed thanks to shorter delivery journeys. On our German site, we carry out internal training sessions on ethical procurement practices to raise our employees' awareness of this important topic.

Our suppliers were rated as follows at the end of the 2023 reporting year:



METRICS AND TARGETS

Key topic: Prohibiting child and/or forced labour



Objective

Child and/or forced labour must be kept permanently at 0% in all existing and new supply chains



KPI

- Number of cases of child and/or forced labour



Actions

- Compliance with the Code of Conduct
- Regular reviews in the form of audits and monitoring



Timescale: Ongoing



A worker on our partner's site in Romania.



A worker on our partner's site in Pakistan.



Workers on our partner's site in China.

Our actions in terms of workers in the value chain are related to the following Sustainable Development Goals:



- **8.5:** *Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.*
- **8.7:** *Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.*
- **8.8:** *Protect labour rights and promote safe and secure working environments for all workers (...).*
- **17.16:** *Enhance the global partnership for sustainable development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the sustainable development goals in all countries, in particular developing countries.*
- **17.17:** *Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.*

CUSTOMERS AND CONSUMERS

IMPACTS, RISKS AND OPPORTUNITIES

For us, it's particularly important that we can satisfy our customers and consumers while, at the same time, meeting all the requirements incumbent upon our products in terms of safety and protection. Customers and consumers also expect any complaints to be dealt with efficiently, should any issues arise with their shoes. Defective products could lead to product liability cases and legal disputes, which could be costly.

New or improved products and processes can enhance the customer experience associated with our brand and lead to competitive advantages. That's why we're seeing increasing opportunities in innovation and excellent customer service. Uncomplicated, open and timely communication, both directly as part of conversations with our customers and indirectly via digital communication channels, is crucial to the perception of the ELTEN brand. Strong customer loyalty, underpinned by strong customer satisfaction, is what allows our company to grow in a sustainable way. Excellent customer service and communication with our customers and retailers, for example, via the ELTEN Academy, can also become a unique selling point and further bind customers to us.

Manufacturing products according to certified standards offers increased opportunities. Certifications and standards signal the quality and safety of our shoes to consumers. At the same time, certifications and compliance with standards incur costs and an increased administrative workload. We see the positive impact of our products on customers and consumers in the fact that foot protection including innovative technologies reduces the number of accidents in the workplace and therefore contributes to improved safety in the workplace. A high level of product quality and safety increases any manufacturer's brand value. With offers available for those with additional needs, such as people with diabetes, ELTEN demonstrates how we're able to respond to people's individual needs and meet the demand for high-quality foot protection. This all contributes to greater customer satisfaction and helps

create a strong brand identity and culture. Handling sensitive customer data always carries a certain risk, and we must be aware of data protection risks when collecting and using customer data.

POLICIES AND ACTIONS

The health and safety of those who wear our shoes is always our top priority. Our entire business is built on it. We communicate directly to our consumers and end users in our shop and online, and with our customers via our broadly developed sales structure, including our sales representatives, some of whom are users themselves. We are also in contact with end users indirectly through our (specialist) retailers. We employ bilingual and multilingual specialist staff to provide customer support and give all our customers high-quality advice.

We're in constant dialogue with our customers via various communication channels. We use customer feedback to continually improve our products and services. As part of the ELTEN Academy, we share basic and expert knowledge on foot protection and sustainability. Our goal is to ensure those who take part in our training sessions can give consumers and end users knowledgeable and competent advice. Orthopaedic shoemakers also share valuable additional expertise, for example, on German statutory accident insurance (DGUV) rule 112-191 (BGR 191) on avoiding accidents in the workplace, occupational diseases and health risks.

We meet the quality and safety standards for our shoes by complying with international standards and specifications. Our foot protection, including orthopaedic modifications, is EU-type approved and bears the CE marking.

We carry out regular testing and quality controls internally. We have also stipulated in our CSR Policy that we strive for and encourage the use of sustainable materials and suppliers (see [Business conduct](#)).





Market-driven pricing for products with sustainable features is important to us. We also protect the health of those who wear our shoes by complying with limit values for restricted substance in accordance with the [cads RSL](#).

In our [Code of Conduct](#), we commit to protecting consumer interests. We care about the needs and interests of consumers. As such, it's important we ensure all our products are harmless and safe for their intended use. In order to guarantee data security for

both customers and consumers, we've implemented an effective data and information management system. Our ethical business principles, including our information management system, are explained in more detail in the [Governance information](#) topic.

METRICS AND TARGETS

We're constantly improving the quality of our processes and products. That's how we were able to keep our complaint rate for material and manufacturing defects below 0.2% in 2023.

Key topic: Minimising material and manufacturing defects		
 Objective	 KPI	 Actions
Keeping our complaint rate for material and manufacturing defects permanently below 0.2%	<ul style="list-style-type: none"> Complaint rate in % 	<ul style="list-style-type: none"> stematically recording and assessing all material and manufacturing defects Deriving corrective measures Checking the effectiveness of corrective measures
 Timescale: By the end of 2025		

Our actions in terms of customers and consumers are related to the following Sustainable Development Goals:



- 3.9:** *By 2030, substantially reduce the number of deaths and illnesses from hazardous chemicals and air, water and soil pollution and contamination.*
- 12.4:** *Achieve the environmentally sound management of chemicals and all wastes throughout their life cycle, in accordance with agreed international frameworks, and significantly reduce their release to air, water and soil (...).*
- 17.17:** *Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.*

GOVERNANCE- INFORMATION

Corporate governance is central to our sustainable business practices. By sustainable corporate governance, we mean holistic and integrative leadership, control and monitoring, taking social responsibility, environmental awareness and long-term success into account.

BUSINESS CONDUCT

LEADERSHIP AND RESPONSIBILITIES

Clear leadership and clear responsibilities are fundamental to successfully implementing sustainable corporate governance. Our approach to leadership and division of responsibilities is about creating an effective structure that ensures we can achieve our sustainability goals and fulfil our due diligence.

Our purpose is to create transparency, set out responsibilities and encourage cross-departmental cooperations.

To achieve this, we're taking a number of defined steps:

1. Defined responsibilities

We clearly set out responsibilities at all levels in relation to

our sustainability goals, from management to our teams working on site.

2. Transparent communication

All our employees understand the role they have to play in terms of implementing sustainability actions and how their duties contribute to our overall goals.

3. Training and support

We offer training and create resources to ensure our employees have the necessary skills to fulfil their tasks within the framework of our sustainability goals.



4. Regular reviews and adjustments

We regularly assess the effectiveness of our actions to ensure they're meeting our current needs. Company management is responsible for outlining these steps and implementing them throughout the organisation. All employees are called upon to play their part within this system, and to actively contribute to achieving our sustainability goals.

By setting out clear responsibilities and communicating transparently, we create an environment where every employee actively contributes to social responsibility and encourages sustainable business practices.



POLICIES

Our company adheres to the fundamental philosophy of sustainability and social responsibility. We're aware of our role in society and our responsibility for the environment, and to respect labour and human rights and sustainable business practices. We're committed to preventing, mitigating and remedying the adverse impacts caused by or related to our business operations.

ELTEN GmbH is committed to manufacturing, sourcing and selling sustainable products and to fulfilling CSR in all company processes - in compliance with applicable legal regulations and internal company requirements. Ensuring social and environmental legislation is observed in all corporate decision-making is something we take very seriously.

Our principles of socially responsibility are set out in the eleven core elements of ELTEN GmbH's Code of Conduct (see [Code of Conduct](#)). ELTEN GmbH and its employees always act in accordance with the principles of our Code of Conduct. At ELTEN GmbH, we undertake to act with integrity, responsibility and respect for the rights and wellbeing of all parties affected by our business activities.

We always act in accordance with applicable laws and ethical principles, promoting working environments that are free of discrimination and harassment.

Our [CSR-Policy](#) defines moral and ethical principles and behaviour for all employees and those acting on behalf of our company. It strengthens our sense of responsibility, as well as our integrity and respect towards those affected by our company.

OUR PRINCIPLES

Discretion

ELTEN GmbH always acts discretely and protectively when handling confidential information and in all business practices more generally to maintain and encourage the trust of our customers and business partners. Our employees are required to keep all confidential

information about our customers, business partners and the company itself private. This applies to all types of information, including financial, human resources, business strategy and technical data.

Integrity

We believe operational integrity is an essential factor in the long-term success of our company. We foster a moral and ethical culture. For us, that means adhering to laws and regulations while respecting the values and interests of society, customers and employees. This helps us earn and maintain the trust of our customers, business partners and other stakeholders. To ensure we're acting with integrity at all times, we've developed our CSR Policy, which all employees must follow. It sets out clear rules and procedures for ethical behaviour and decision-making, and provides opportunities for employees to report and resolve any ethical conflicts.

Communication

An unrestricted corporate communications culture, where all employees can speak openly and honestly with one another, is an essential part at ELTEN GmbH.

ELTEN is committed to creating a positive culture and environment based on trust and responsibility, where every employee can be heard. This enables us to identify and solve problems quickly, make decisions and achieve our goals.

Management and leaders communicate openly and honestly with employees about their opinions and concerns. Our established zero-tolerance policy when it comes to bullying and discrimination ensures all employees can feel safe and protected and not restricted in what they can say.

ELTEN GmbH's complaints management system ensures all reported problems and complaints are quickly investigated and resolved, which helps improve both employee and customer satisfaction. Our integrated whistleblowing system is a key part of our operational communications. It gives employees the opportunity to speak up about any problems or concerns anonymously and securely. This helps ensure any potential problems are identified early and resolved before they can have a major impact.

ELTEN GmbH uses its whistleblowing system effectively and efficiently to ensure any problematic issues identified are resolved quickly.

Our effective, unrestricted corporate communications, complaints management and integrated whistleblowing systems are essential to the success of ELTEN GmbH. Together, they mean we can quickly identify and solve problems, make decisions and achieve our goals. At ELTEN, we encourage the use of these tools to constantly improve our performance and satisfy our employees and customers alike.

Respect

ELTEN understands how appreciative interactions have a positive effect on wellbeing, as well as morale in the workplace, motivation and employee productivity. A respectful work environment helps create a pleasant

working atmosphere, where all employees can feel comfortable and valued. We ensure all our employees are treated with respect, regardless of their status, role or grade.

An appreciative work environment means prohibiting prejudice or discrimination based on gender, age, religion, ancestry, birth, social background, disability, ethnic or national origin, nationality, membership of a trade union or other legitimate organisation, political affiliation or opinions, sexual orientation, family responsibilities, marital status, pregnancy, diseases or other conditions.



Transparency

Transparency in a corporate context refers to disclosure of information and data within a company. ELTEN's aim is to give all our employees access to the information they need to go about their work more effectively and efficiently.

We encourage a culture of open communication to strengthen collaboration between our employees. This helps avoid mistakes and optimises processes.

ELTEN brings this concept to life via internal communication channels. Constantly communicating information and processes ensures all rules and regulations are adhered to.

Sense of responsibility

At ELTEN, we're aware of our responsibilities for our own actions and the impact they can have on society and the environment. This responsibility includes economic, environmental and social aspects, and goes beyond the legal requirements alone.

We actively incorporate the interests of our stakeholders in our business operations, including our employees, customers, business partners, suppliers, communities and the environment. For example, this relates to fair working conditions, sustainable supply chains, use of renewable energies and avoiding harmful emissions.

Through this everyday awareness of our responsibilities, we strive to increase the commitment and motivation of our employees and strengthen our long-term business relationships.



INFORMATION SECURITY AND INFORMATION MANAGEMENT

ELTEN understands that information security and information management are crucial to the success and future viability of our company. In an age when data and information have become precious commodities, companies must take effective steps to manage and protect these valuable resources.

We've developed a comprehensive information security policy that is regularly reviewed and adjusted to ensure it always remains up to date. This policy includes actions such as regular security updates, firewall protection, access control and data encryption. An appropriately qualified data protection officer is responsible for its implementation and monitoring.

In terms of information management, we've introduced an effective system for managing data and information. We use modern technologies and adhere to a systematic approach to ensuring important information is always protected from unauthorised access.

ELTEN strives to continuously improve and optimise our information security and information management.

SUPPLIER MANAGEMENT

We recognise that the way in which we manage our supply chains and procurement has a significant impact on the environment and society. As such, we decided to implement a sustainable procurement policy that underlines our responsibilities and supports us in achieving our goals. The policy is set out in more detail in ELTEN's CSR Policy.

Our sustainable procurement principles include:

1. Environmental responsibility

We only work with suppliers who demonstrate significant environmental responsibility and care about improving their environmental impact.

2. Social responsibility

We only work with suppliers who demonstrate social responsibility and create fair working environments for their staff.

3. Sustainable supply chain management

We require all suppliers and service providers within our supply chain to adhere to the same principles of sustainability as we do.

4. Responsible use of resources

We work closely with our suppliers and service providers to minimise the use of natural resources and reduce waste.

5. Transparency and communication

We maintain open and transparent communication with all our suppliers and service providers to ensure they understand – and are able to implement – our sustainable procurement principles.

6. Reviews and monitoring

We regularly review the performance of our suppliers and service providers to ensure they're adhering to our sustainable procurement principles.

By implementing these principles, we can ensure we're building a sustainable supply chain and fulfilling our environmental and social responsibilities. They also help us meet the challenges of the future and allow us to remain a sustainable and successful company. Our sustainable procurement policy is an important part of our business practices, which we regularly review and improve. We will continue to communicate with all relevant stakeholders on this matter.

We firmly believe sustainable procurement is critical to our future development, which is why it is – and will remain – an integral part of our processes.

PREVENTING AND DETECTING CORRUPTION AND BRIBERY

Corruption

Corruption can damage affected companies and people’s trust. ELTEN explicitly rejects any behaviour that could be described as corrupt. At ELTEN, we recognise that corruption doesn’t just break the law, it’s also morally reprehensible. As such, we are committed to maintaining a corporate culture based on integrity and ethical business behaviour.

That means we avoid and address all forms of corruption in our business activities. Relevant guidelines are set out in our CSR Policy. We believe honest and transparent business practices are not only essential, but also lead to better outcomes. That’s why we’ve implemented comprehensive anti-corruption actions that allow us to detect and prevent corruption.

Employees whose work puts them at heightened risk of corruption are carefully recruited, made aware of this aspect of their responsibilities, and trained accordingly. Employees are made aware of the risks of corruption and informed about the consequences of any corrupt conduct. ELTEN GmbH has also established a secure and confidential channel through which employees can report suspicious activity.

Bribery

At ELTEN GmbH, bribery is an inappropriate and unacceptable form of behaviour. Not only is it illegal, but it also undermines trust in our company and compromises the integrity of the business. ELTEN recognises the negative impact of bribery and therefore commits to fostering a strong culture of integrity and ethics. ELTEN’s CSR Policy and Code of Conduct help our employees maintain integrity and ethics in the context of our business operations. To ensure all employees have a clear understanding of the importance of integrity and ethics in the workplace, we provide relevant support.

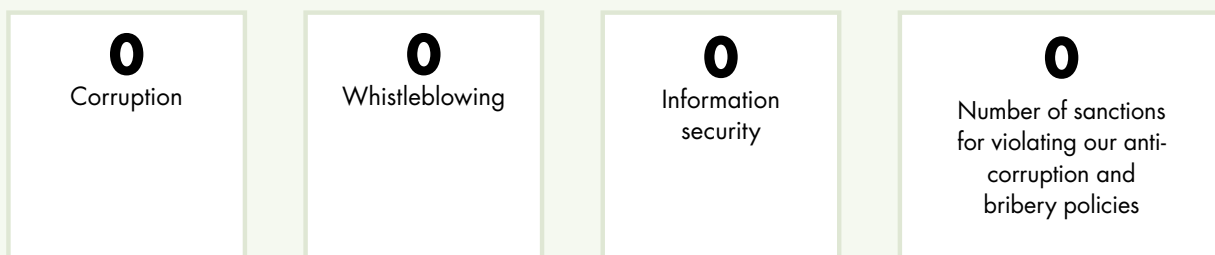
We take precautions to identify and prevent potential attempts at bribery. Carefully vetting our business partners, alongside managing and monitoring business transactions, helps minimise the risk of bribery.

We provide a secure and confidential channel through which employees can report suspicious activity. For ELTEN, integrity comes ahead of all else, and the company firmly rejects bribery in all its forms.

By promoting a strong culture of integrity and ethics, as well as implementing our CSR Policy and Code of Conduct, we’re demonstrating our commitment to transparent and honest business practices.

METRICS AND TARGETS

The following incidents were reported or confirmed during the 2023 reporting period:



Key topic: Compliance with global guidelines



Objective

1. Keeping the number of violations of our compliance guidelines, cases of misuse of data, violations of relevant anti-competition laws, and cases of fraud, bribery and corruption in relation to our company permanently at 0
2. Training all potentially affected employees



KPI

1. Number of violations
2. Proportion of trained employees in %



Actions

- Supporting employees to ensure they're informed about the relevant requirements and processes
- Working closely with relevant consultants
- Offering training to all employees



Timescale: By the end of 2025

Our actions in terms of business conduct are related to the following Sustainable Development Goals:



- **8.5:** *Achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.*
- **8.8:** *Protect labour rights and promote safe and secure working environments for all workers, including migrant workers, in particular women migrants, and those in precarious employment.*
- **17.16:** *Encourage and promote effective public, public-private and civil society partnerships, building on the experience and resourcing strategies of partnerships.*



ELTEN

LEGAL NOTICE

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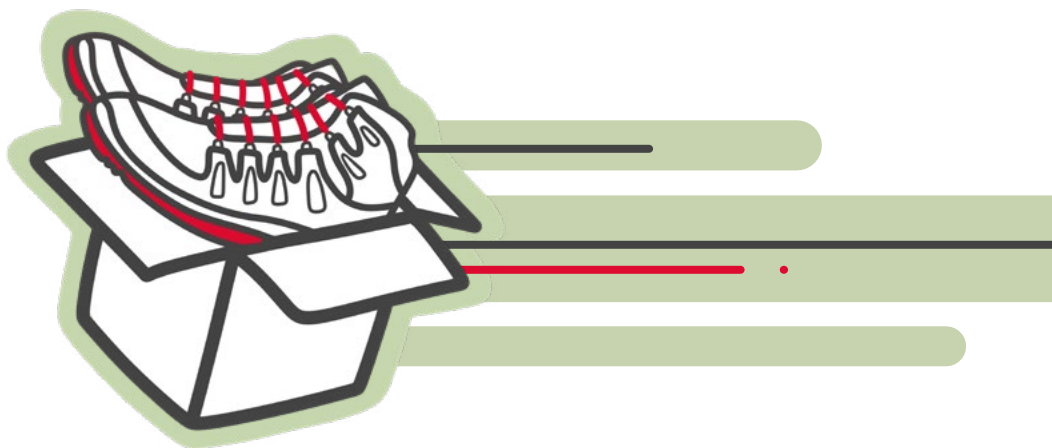
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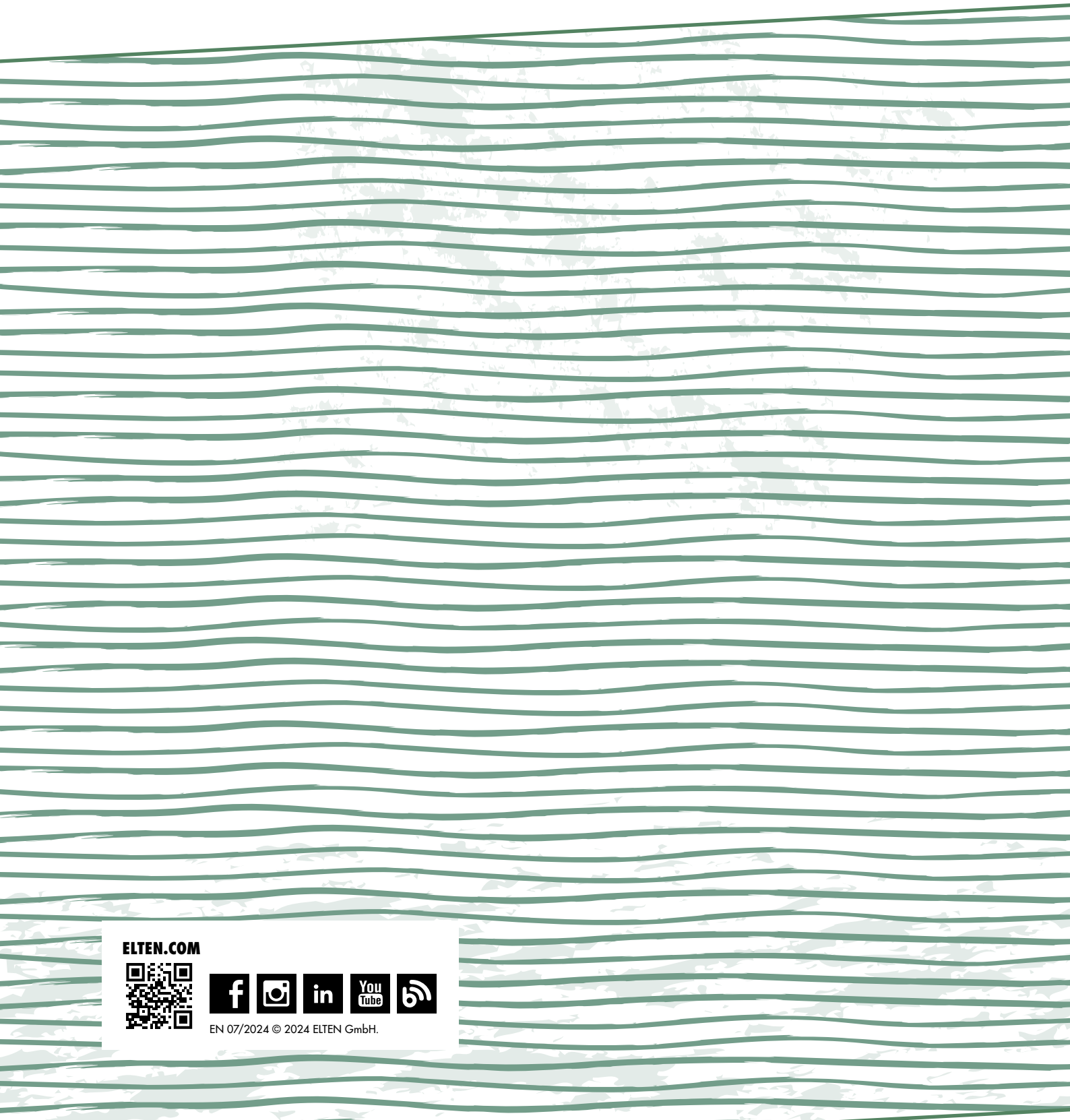
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