



**Westfälische Drahtindustrie GmbH**

## Sustainability Report

in accordance with the GRI Standards

2024

## Foreword CEO

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Companies are constantly faced with the challenge of responding to the changing conditions in the world and adapting their corporate strategy and business activities accordingly. Public perception currently gives the impression that the upcoming changes, which some are labelling as crises, are particularly serious and that the resulting requirements could potentially overburden companies. In particular, the increasing legal requirements relating to environmental protection and social responsibility are often perceived as a restriction on economic freedom and an obstacle to the growth of companies.

At WDI, however, we are convinced that the careful use of natural resources and the respectful and fair treatment of employees, business partners and other stakeholders have always been and continue to be an essential part of a company's success. This principle has been part of our company history since it was founded in 1856, and we are proud that we have always lived up to this claim. Over 150 years of company history are a clear sign that WDI has consistently pursued this guiding principle.

Of course, we at WDI also recognise the major challenges associated with the transformation to CO<sub>2</sub>-free production and the shortage of skilled workers. However, we identified these issues as crucial at an early stage and possibly even took appropriate measures and set standards faster than other companies.

In this sustainability report, we would like to provide an overview of the measures and strategies that WDI has taken to date to fulfil the requirements of sustainable development.

However, we do not simply attach importance to our previous successes in order to rest on our laurels. We are firmly convinced that the continuous development of our business activities and constant adaptation to changing conditions are the key to the long-term and sustainable development of our company. We want to work continuously on this further development and see the regular publication of our sustainability report as an indispensable tool for informing our stakeholders transparently and openly about our progress.

However, these continuous endeavours and the mastery of ever new challenges would not be possible without the dedicated work of our employees. The management would therefore like to use the publication of this report to express its sincere thanks for their hard work.

Katja Pampus

Chairwoman of the Management Board  
Hamm | April 2025





# 1. The organisation and its reporting obligations

## GRI 2-1

### Organisational profile

Name of the organisation: Westfälische Drahtindustrie GmbH (here in after referred to as WDI). The head office of WDI is located at Wilhelmstraße 7, 59071 Hamm, Germany.

WDI has the legal form of a limited liability company (GmbH) and is a family-run company.

WDI has 14 operating sites in Germany (see GRI 2-6) as well as 100% shareholdings in the following companies::

- Nedri Industriedraht GmbH, Hamm, Germany
- WWH Westfälische Walzdrahthandel GmbH, Hamm, Germany
- Nedri Spanstaal BV, Venlo, Netherlands
- Unirop Ltd, Mississauga, Canada
- WDI Trading Shanghai Ltd, Shanghai, China
- WDI Polska spzoo, Katowice, Poland

Further information on the company can be found on the website [www.wdi.de](http://www.wdi.de).

## GRI 2-2

### Entities included in the organisation's sustainability reporting

Sustainability reporting is carried out exclusively for the individual company Westfälische Drahtindustrie GmbH.

## GRI 2-3

### Reporting period, reporting frequency and contact point

This Sustainability Report is WDI's second report and relates to the 2023/2024 financial year (1 October 2023 - 30 September 2024).

This report was published on 1 April 2025; the report is updated annually and published on the website [www.wdi.de](http://www.wdi.de).

There is a contact form on the website that can be used to send all questions and comments about the report directly to the sustainability department.

## GRI 2-4

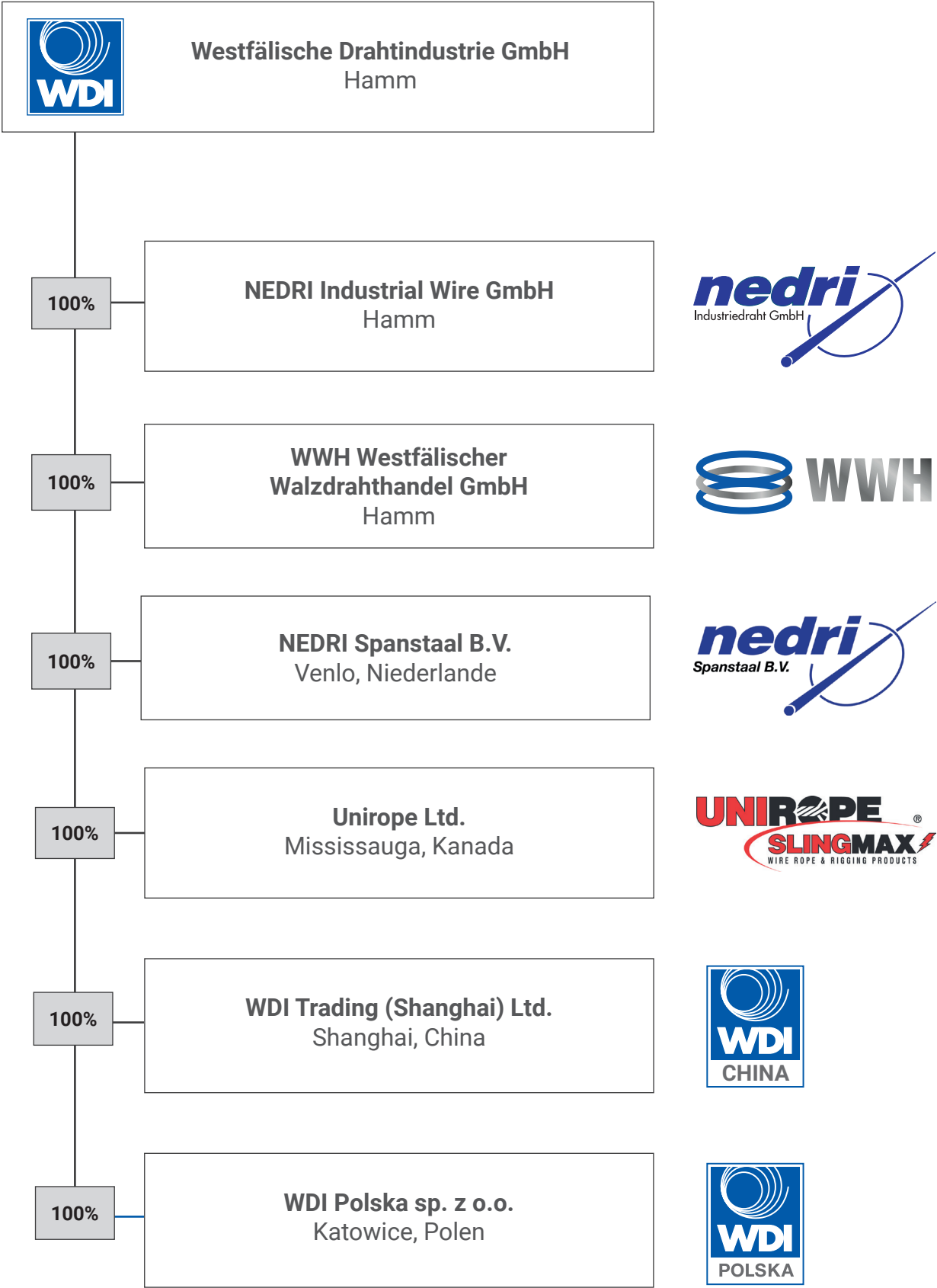
### Correction or restatement of information

No significant changes have been made in this second report. The content structure corresponds to that of the first report.

## GRI 2-5

### External audit

There is currently no external audit of the report. However, the management of WDI has satisfied itself that the data used in the report is consistent with both the data published as part of the financial reporting and with the internal data.



## 2. Activities and employees

GRI 2-6

### Activities, value chain and other business relationships

WDI is a steel processing company and primarily manufactures wire products for the processing industry. WDI is the largest independent wire producer in Europe and supplies customers worldwide.

The individual products are manufactured at different production sites, each of which is organised in the form of a profit centre (PC). There are 4 PCs at the Hamm sites and 3 PCs are located at the Rothenburg site. All other locations only have a single PC.

In detail, the following products are manufactured for the following customer industries.

Product	Major customer industry	Operating sites (PC)
Reinforced steel mesh	Construction industry	Salzgitter (PC07)
Cold heading wire	Automotive industry, Construction industry	Hamm (PC03) Kalthof (PC10)
Steel wires	Automotive industry, Mechanical engineering	Hamm (PC03) • Rothenburg (PC01) Kalthof (PC10)
Iron wires	Furniture industry	Hamm (PC03) • Rothenburg (PC01) Brandenburg (PC15)
Flat wire	Construction industry	Brotterode (PC06)
Bright steel	Automotive industry, Mechanical engineering, Trade	Hamm (PC08) • Schwerte (PC09) Ixheim (PC13)
Welding wire	Automotive industry, Mechanical engineering, Wind energy, Pipeline construction	Hamm (PC04) Rothenburg (PC14)
Steel cables	Construction industry, Mining, Mobile cranes	Dortmund (PC11) • Syke (PC12) Zwickau (PC19)
Overhead cables	Energy industry	Rothenburg (PC02) Berlin (PC16)
Prestressing steel	Construction industry	Hamm (PC05)
Barbed wire	Horticulture, Forestry	Altgandersheim (PC18)

The raw material for the products is wire rod, sourced from German and European steel-works and rolling mills. The wire rod, supplied in coils, is transported and processed through cold forming to achieve thinner dimensions. Due to varying product requirements, some wires undergo additional treatments such as pickling, annealing, and galvanising. After the drawing process, some products go through further processing steps, such as manufacturing steel and overhead line cables.

The plant in Altgandersheim (PC 18) also purchases fences and gates from external suppliers and sells them to German or European customers.

## GRI 2-7

## Employees

At the end of the 2023/2024 reporting year (30/09/2024), WDI had 1,277 employees. The breakdown of employees is shown in the following table:

Female	Male	Other*	Not disclosed	Total
Number of employees (number of employees)				
128	1.149	-	-	1.277
Number of permanent employees (number of employees)				
105	1.049	-	-	1.154
Number of temporary employees (number of employees)				
23	100	-	-	123
Number of employees with non-guaranteed working hours (number of employees)				
-	-	-	-	-
Number of full-time employees (number of employees)				
77	1.104	-	-	1.181
Number of part-time employees (number of employees)				
10	39	-	-	49

\* Gender, as indicated by the employees themselves

All employees work at the individual production sites in Germany.

## GRI 2-8

## Employees who are not salaried employees

At the end of the reporting year 2023/2024 (30/09/2024), 58 employees (full-time equivalent) were employed as temporary workers. These employees are mainly deployed in production.

### 3. Corporate management

#### GRI 2-9 Management structure and composition

The Supervisory Board monitors the Management Board at regular intervals. During the Supervisory Board meetings, the Management Board informs the Supervisory Board about the current developments and plans for future development.

The Supervisory Board is also responsible for monitoring the management of the company's impact on the economy, the environment and people.

The term of office of each member of the Supervisory Board is 4 years.

#### GRI 2-10 Nomination and selection of the highest supervisory body

The Supervisory Board consists of three members. Two members are appointed by the respective shareholders. The third member is an employee representative who is elected by the workforce. All members of the Supervisory Board have extensive knowledge and experience due to their many years of work in the steel industry.

#### GRI 2-11 Chairman of the highest supervisory body

The Chairman of the Supervisory Board is elected by the members of the Supervisory Board. Like the other members of the Supervisory Board, the Chairman is not a manager in the company.

#### GRI 2-12 Role of the highest supervisory body in overseeing the management of impacts

In addition to the statutory requirements, the company's articles of association and the rules of procedure for the Management Board provide the framework for the Supervisory Board's supervisory activities. At the end of the financial year, the Supervisory Board approves the company's annual financial statements and discharges the Management Board accordingly.

In order to be able to fulfil its control function, the Supervisory Board is involved in the The members of the Supervisory Board are provided with comprehensive information on all matters relating to the respective reporting period at regular Supervisory Board meetings. The Supervisory Board receives the relevant information in advance of the meetings so that the members of the Supervisory Board can inform themselves accordingly. be able to prepare such information. If information is required outside of the normal Supervisory Board meetings, the Supervisory Board has the opportunity to request this information from the Management Board at any time.

The Supervisory Board also monitors the Management Board to ensure that the values and guiding principles of the company, as well as the strategy, policy and objectives of the company in are in line with the ideas of the various stakeholders.

#### GRI 2-13 Delegation of responsibility for managing the impact

The Supervisory Board monitors the Management Board, which bears operational responsibility for the company. In addition to the economic and operational aspects of the The monitoring of the company also includes the management of the company's impact on the economy, the environment and people.



## **GRI 2-14 Role of the highest governance body in sustainability reporting Reimbursement**

The sustainability report is submitted to the Supervisory Board for information sent to the Supervisory Board. As this sustainability report was prepared voluntarily, it does not currently require review and approval by the Supervisory Board.

## **GRI 2-15 Conflicts of interest**

Conflicts of interest can of course arise at any time if the responsible persons have different business interests. However, due to the framework given to the company, which is specified both in the articles of association and in the rules of procedure for the management, the potential for conflicts of interest is very limited.

## **GRI 2-16 Transmission of critical concerns**

Critical concerns are communicated to the Supervisory Board by the Management Board in written or verbal form.

No critical concerns were submitted in the reporting year.

## **GRI 2-17 Collected knowledge of the highest supervisory body**

Topics relating to resource efficiency, e.g. energy consumption, are discussed during regular management briefings. The future transmission of the sustainability report will result in significantly more extensive reporting on the area of sustainable development.

## **GRI 2-18 Evaluation of the performance of the highest governance body**

The assessment of the performance of the highest governance body is based on compliance with legal requirements.

## **GRI 2-19 Compensation policy**

The remuneration for the Supervisory Board members is fixed and essentially represents a reimbursement of costs. In the 2023/2024 financial year, a total of EUR 23 thousand was paid to the three members of the Supervisory Board.

## **GRI 2-20 Procedure for determining the remuneration**

The remuneration of the Supervisory Board members was determined by the shareholders and can be adjusted regularly. Variable remuneration components are not provided for.

## 4.Strategy, policies and practices

GRI 2-22

### Declaration of application of the sustainable development strategy

WDI has had a sustainability policy in place for several years, which is revised annually. The last revision took place in January 2025. The sustainability declaration („Sustainability - an integral part of WDI's corporate policy") is available at any time on the website: [www.wdi.de](http://www.wdi.de)

The sustainability declaration prioritises environmental protection, waste avoidance and energy efficiency. The short-, medium- and long-term effects of production on the economy, the environment and people are constantly being reduced by using chemical products in a resource-conserving manner and permanently reducing the use of fossil fuels or replacing them with renewable energy.

With regard to the specific implementation of this sustainability strategy, please refer to the comments on GRI Standards 301, 302, 303, 305 and 306 in this report.

Based on the experience gained in recent years and strategic considerations, the management set a date for CO<sup>2</sup> neutrality for the first time in November 2023. The company plans to make its production (Scope 1 and 2) climate-neutral by 2045. In addition, WDI is in constant contact with its suppliers and service providers in order to reduce the CO<sup>2</sup> emissions of purchased primary products and services. The corresponding „Guideline on reduction targets for climate-damaging greenhouse gases (GHG)" can be accessed at any time on the company website [www.wdi.de](http://www.wdi.de).

GRI 2-23

### Declaration of commitment to principles and practices

The management of WDI has published the principles and instructions for responsible corporate behaviour in the „Code of Conduct and Ethics for Business Partners of Westfälische Drahtindustrie GmbH". This guideline is revised annually and can also be accessed at any time on the company website [www.wdi.de](http://www.wdi.de).

The Code of Conduct and Ethics must be observed by all business partners of WDI and therefore applies to employees, suppliers, customers and other stakeholders. The Code of Conduct and Ethics makes the corporate values clear and is intended to help ensure that the company's expectations with regard to compliance with the law and ethical behaviour are met.

GRI 2-24

### Inclusion of the declarations of commitment to principles and practices

All of the company's employees receive annual training on the sustainability declaration and the Code of Conduct and Ethics. The training is carried out by the respective supervisor and is reviewed by the HR department.

From 2025, the GHG reduction directive will also be included in the scope of training. In addition, all suppliers are obliged to agree to the guidelines specified by us on the basis of purchasing specifications.

All of the company's investment projects are also based on the requirement to obtain the most energy-efficient system configuration.

By using an electronic legal register, all responsible employees of the company are informed about the laws and regulations applicable to their area, primarily in the areas of the environment and occupational safety. By consistently working through the legal obligations derived from the laws and regulations, WDI's management is able to check WDI's legal compliance at any time using a centralised IT tool.

#### **GRI 2-25 Procedure for eliminating negative impacts**

WDI has set up a whistleblower hotline on its website [www.wdi.de](http://www.wdi.de), giving all stakeholders the opportunity to report misconduct by the company or its employees. This report can be made anonymously or optionally with Mentioning the name. A hotline has also been set up to report violations of the Supply Chain Due Diligence Act.

The two hotlines were activated at the end of 2023. No reports of misconduct had been received by 30/03/2024

#### **GRI 2-26 Procedure for seeking advice and reporting concerns**

In addition to the complaints procedures via the hotlines described in GRI 2-15, all employees can all employees can seek advice via the store stewards of the works councils and report any misconduct by superiors. In addition, there is regular contact between employees and management during the regular site visits, which create opportunities to address problems at management level. Works meetings are held regularly with the participation of the management, so that employees can also address undesirable developments directly or anonymously via the works councils.

#### **GRI 2-27 Compliance with laws and regulations**

There were no significant violations of laws and regulations in the reporting period.

## **GRI 2-28 Membership of associations and interest groups**

The company is a member of the following organisations:

- Iron Wire and Steel Wire Association (ESV)
- Welding Electrode Association (SEV)
- Unternehmensverband Westfalen-Mitte e.V.
- Association of German Women Entrepreneurs
- Association of the German Spring Industry (VDFI)
- Federal Association of Small and Medium-Sized Enterprises
- Fachverband Metallzauntechnik e.V.
- Fachverband Drahtzaun e.V.
- Institute for Reinforced Concrete Reinforcement e.V. (ISB)
- Stabziehereien-Vereinigung e. V. (STV)
- FSA Professional Association for Ropes and Slings e.V.
- Bundesverband Draht e.V. ( BVD)
- WSM Wirtschaftsverband Stahl- und Metallverarbeitung e.V.
- Economic Associations of Drawing Mills and Cold Rolling Mills e.V.

In order to further reduce the possibility of anti-competitive agreements, WDI decided at the end of 2023 to discontinue or phase out all cooperation in the commercial committees of the aforementioned associations. However, cooperation in the technical committees is still considered necessary and will continue.

## **5. Stakeholder involvement**

### **GRI 2-29 Approach to stakeholder involvement**

As a globally active company, WDI recognises that it shares responsibility for solving the environmental and social challenges that arise from our economic activities. WDI strives for close cooperation with all social groups. To this end, those responsible at WDI are in regular contact with employees, authorities, customers, suppliers and other stakeholders in order to identify at an early stage whether existing specifications or internal guidelines need to be adapted or improved.

### **GRI 2-30 Collective labour agreements**

Collective agreements apply to all employees of WDI, with the exception of the members of WDI's management.

## **6. Essential topics**

### **GRI 3-1 Process for the identification of material topics**

The company is in constant dialogue with its various stakeholders as part of its normal business activities. The following topics have emerged from this dialogue and have been assessed as part of an internal risk analysis: See next page

The respective order of the topics does not represent a prioritisation.

Stakeholder	Topics 2024	Dialogue and Communication formats
Employees	<ul style="list-style-type: none"> <li>• Inflation, increased energy prices</li> <li>• Healthcare and sickness rate</li> <li>• Occupational safety</li> <li>• Education and training, training courses</li> <li>• Shortage of skilled labour</li> <li>• Home office</li> </ul>	<ul style="list-style-type: none"> <li>• WorksCouncil</li> <li>• Worksm meetings</li> <li>• Personaldiscussions</li> </ul>
Business customers	<ul style="list-style-type: none"> <li>• Production reliability and quality</li> <li>• Sustainability in the supply chain</li> <li>• Green steel</li> </ul>	<ul style="list-style-type: none"> <li>• Customer meetings and visits</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>• Production volume</li> <li>• Green steel</li> <li>• Trustful cooperation</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier meetings and visits</li> </ul>
Shareholder	<ul style="list-style-type: none"> <li>• Production volume or capacity utilisation</li> <li>• Profitability</li> <li>• Acting in compliance with the law</li> </ul>	<ul style="list-style-type: none"> <li>• Shareholders' meeting</li> <li>• Supervisory Board meeting</li> </ul>
Legislator	<ul style="list-style-type: none"> <li>• New regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Association activities</li> </ul>

## GRI 3-2

### List of key topics

The regular dialogue with our company's stakeholders on the one hand and the internal risk analysis on the other were combined by the management into a comprehensive materiality analysis in order to support the company's sustainability strategy.

The materiality analysis identified the key issues of „shortage of skilled labour“, „Health protection and sickness rate“, „Green steel“ and „Sustainability in the supply chain“.

## GRI 3-3

### Management of material topics

The actual and potential negative and positive impacts of the material topics and the measures taken to avoid negative impacts are described in detail in the following GRI Standards.

#### Material topics

- Shortage of skilled labour
- Health protection and sickness rate
- Green steel
- Sustainability in the supply chain

#### GRI-Standard

- GRI 401 and GRI 402, 403-6
- GRI 403
- GRI 2-22, GRI 201-2, GRI 308
- GRI 308 and GRI 414

In the respective areas, the company works closely with the relevant stakeholders in order to reduce or completely avoid potential negative effects on the economy, the environment and people.



## 7. Economic standards

### GRI 201 Economic performance

#### 201-1 Directly generated and economic value

WDI regularly publishes its annual financial statements at [www.bundesanzeiger.de](http://www.bundesanzeiger.de). The direct generated and economic value of the company can be seen from these publications.

#### 201-2 Financial implications of climate change for the organisation and other risks and opportunities associated with climate change

The risks and opportunities associated with climate change for the WDI correspond to the consequences that exist for the steel-producing industry due to the transformation process, as the WDI is directly dependent on the steel and rolling mills in the supply chain, and the necessary adaptation or change in the steel production process from the blast furnace process to the electric arc furnace process will have an impact on the production costs and quality of the wire rod. However, these consequences are not currently foreseeable.

#### 201-4 Financial support from the public sector

The company did not receive any support from the public sector in the reporting year.

The company can potentially receive subsidies for certain investment projects that aim to reduce energy consumption or CO<sub>2</sub> emissions.

In the reporting year, a single measure was funded with € 82,460.

### GRI 202 Market presence

#### 202-1 Ratio of the standard starting salary broken down by gender to the local statutory minimum wage

The company's employees (wage and salary earners) receive remuneration above the statutory minimum wage.

#### 202-2 Proportion of senior management recruited from the local community

The proportion of senior managers (managing directors and PC managers) from Germany is 100%.

### GRI 204 Procurement practices

#### 204-1 Share of expenditure for local suppliers

The proportion of expenditure on local (German) suppliers totalled 87% in the reporting year.

## **GRI 205    Anti-corruption**

### **205-1    Operations that have been screened for risks related to corruption**

All WDI operating sites are regularly checked for corruption risks by the management as part of a risk assessment.

No corruption risks were recognised.

### **205-2    Communication and training on anti-corruption policies and procedures**

100% of all management and sales employees are trained in anti-corruption.

## **GRI 206    Anti-competitive behaviour**

### **206-1    Legal proceedings due to anti-competitive behaviour, cartel and monopoly formation**

In the reporting year, there were no legal proceedings initiated under national and international law with the primary aim of regulating anti-competitive behaviour and the formation of cartels and monopolies

## **GRI 207    Taxes**

### **207-1    Tax concept**

The company complies with all tax laws in Germany and abroad.  
There is no separate tax strategy.

### **207-2    Tax governance, control and risk management**

The management is responsible for compliance with tax laws.

### **207-3    Stakeholder involvement and management of tax concerns**

The company is regularly audited by the tax authorities. The audit by the tax authorities did not reveal any discrepancies with the tax documents submitted.

## 8. Ecological standards

GRI 301

### Materials

301-1

#### Materials used by weight or volume

The following renewable materials were used as raw materials in the reporting year:

Material type	tonnes	Material type	tonnes
Wire rod (steel)	504.000	Aluminium	7.100
Stainless steel	4.000	Zinc	950
Blasting media	950	Copper	220
Lead	90	Zinc-aluminium alloys	70

The following non-renewable materials were used as auxiliary and operating materials in the reporting year:

Material type	tonnes	Material type	tonnes
Hydrochloric acid	5.900	Drawing agent	400
Sulphuric acid	230	Greases + Oil	130

Both renewable and non-renewable materials are purchased from external suppliers. The values listed are directly recorded quantities.

Packaging materials are not recorded separately as these quantities are insignificant. As a rule, wire products are sold on reusable racks or drums that are returned by the customer as part of a reusable system and are therefore used several times.

301-2

#### Recycled raw materials used

The wire rod used is produced by melting iron ore and scrap. The proportion of scrap used varies considerably depending on the production process and is dependent on the quality of the wire rod and the steel or rolling mill supplying it. According to the company's estimate, scrap accounts for around 25% of the wire rod purchased in the reporting year.

The other raw materials, as well as the auxiliary and operating materials, such as hydrochloric acid, are also partly made from recycled material.

However, this recycling share cannot be estimated and is therefore recognised by the company at 0% as a precautionary measure. The above estimates indicate that 126,000 tonnes, i.e. approx. 24% of the raw materials used, have been recycled.

301-3

### Recycled products and their packaging materials

As steel products are complete and recyclable materials, the recycling rate of the products supplied by WDI is very high at approx. 95% (estimate).

Incoming material is often delivered on wooden pallets that are not recyclable for our company. These pallets are disposed of by certified waste disposal companies. Other packaging materials are also collected centrally on the respective factory premises and disposed of by waste disposal companies.

GRI 302

## Energy

302-1

### Energy consumption within the organisation

The company's energy consumption is broken down as follows:

Energy source	KWh	Megajoule
Electricity	88.947.000	320.208.000
Natural gas	94.824.000	341.366.000
Diesel	3.456.000	12.440.000
Heating oil	1.458.000	5.251.000
District heating	273.000	983.000
<b>Total energy consumption within the organisation</b>	<b>188.958.000</b>	<b>680.248.000</b>

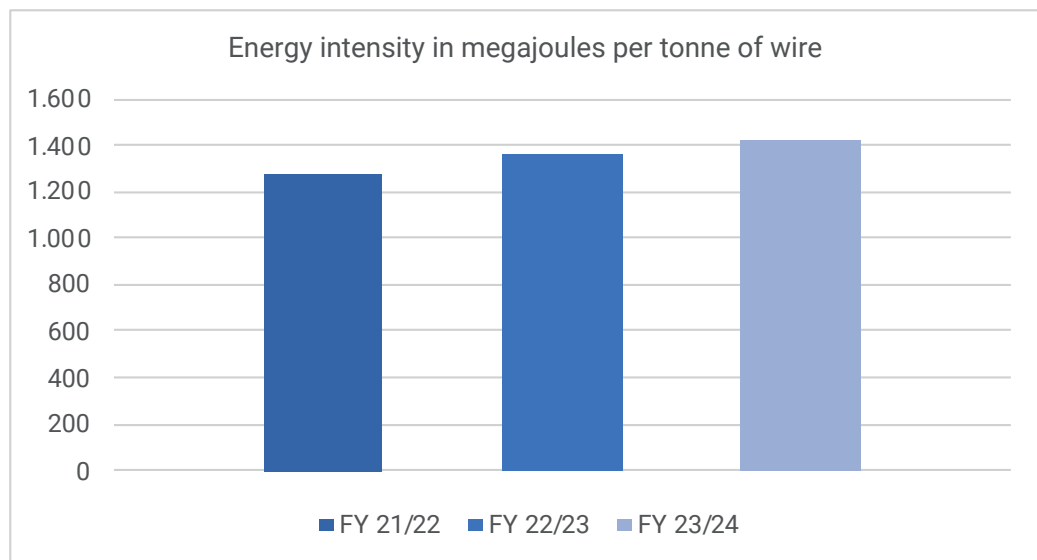
In the reporting year, the company consumed 95,478 KWh of self-generated electricity. Nevertheless, a significant proportion of total electricity production in Germany is now renewable. According to WDI's electricity supplier, the share of renewable electricity in the total amount of electricity purchased by WDI is 49.1%.

This results in a quantity of renewable electricity of 43,673,000 KWh or 157,222,000 joules.

### Energy intensity

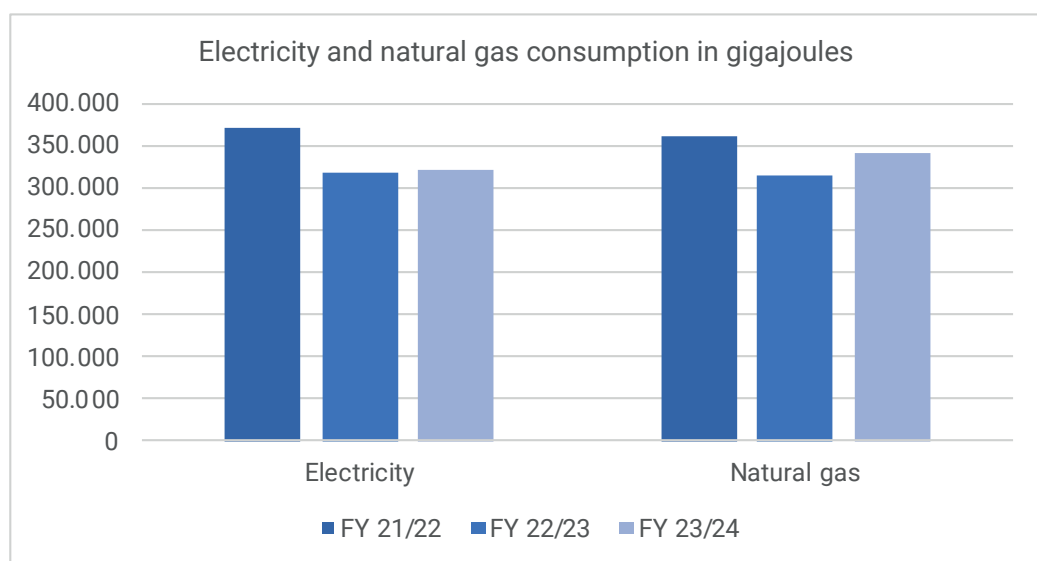
The energy intensity of the WDI is calculated using an energy intensity ratio, which sets the total energy consumption in relation to the production volume. It should be noted that the energy intensity ratio can be strongly influenced by changes in the production volume, as consumption that is independent of the production volume, such as lighting or heating, is allocated to the additional or reduced tonnage. The change in the production mix also has a considerable influence on the energy intensity ratio.

The energy intensity ratio has developed over the last three financial years as shown in the following chart:



### Reduction in energy consumption

WDI's energy consumption has developed in absolute terms over the last three financial years as shown in the following chart:



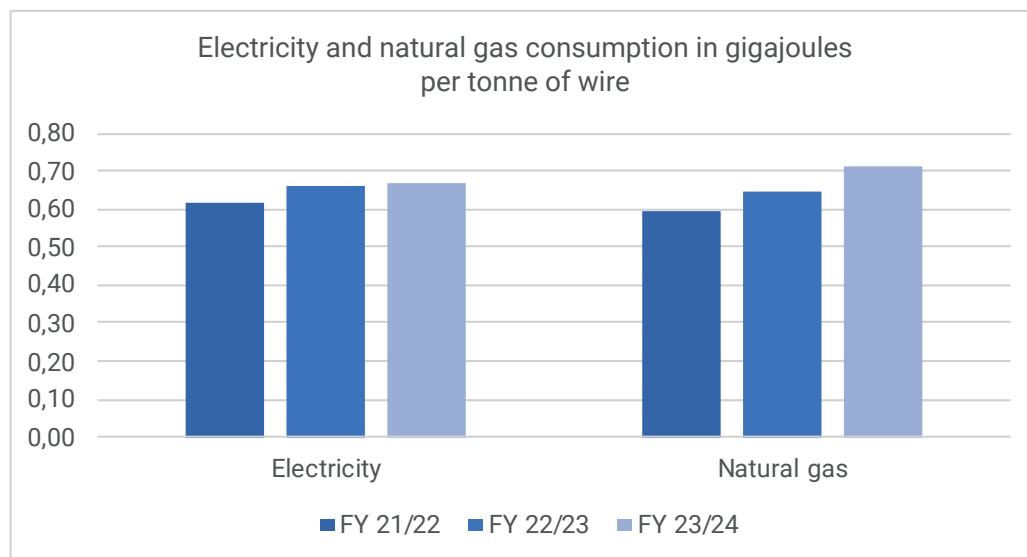
The slight increase can be attributed to the lower production volume on the one hand and the significantly colder winter on the other. Energy-saving measures were also implemented to counteract the increases caused by external circumstances.



302-5

### Reduction in energy requirements for products and services

WDI's energy consumption per tonne of wire produced has developed over the last three financial years as shown in the following chart:



The reason for the increase in electricity and energy consumption per tonne of wire in the reporting year is mainly due to non-production-related consumption, e.g. for lighting and heating, which is spread over a lower production volume. The influence of lower temperatures can also be seen here, which leads to increased gas consumption.

GRI 303

### Water and waste water

303-1

#### Water as a shared resource

WDI uses water exclusively as cooling water in the production process and, to a much lesser extent, as sanitary water in the shower and social rooms for employees.

As part of the utilisation of cooling water, depending on the location, the water from the municipal tap water network or, to a lesser extent, directly from a watercourse. After the water has been utilised, it is either returned to the municipal wastewater network as process water or purified and discharged into the watercourse.

303-2

#### Dealing with the effects of water recirculation

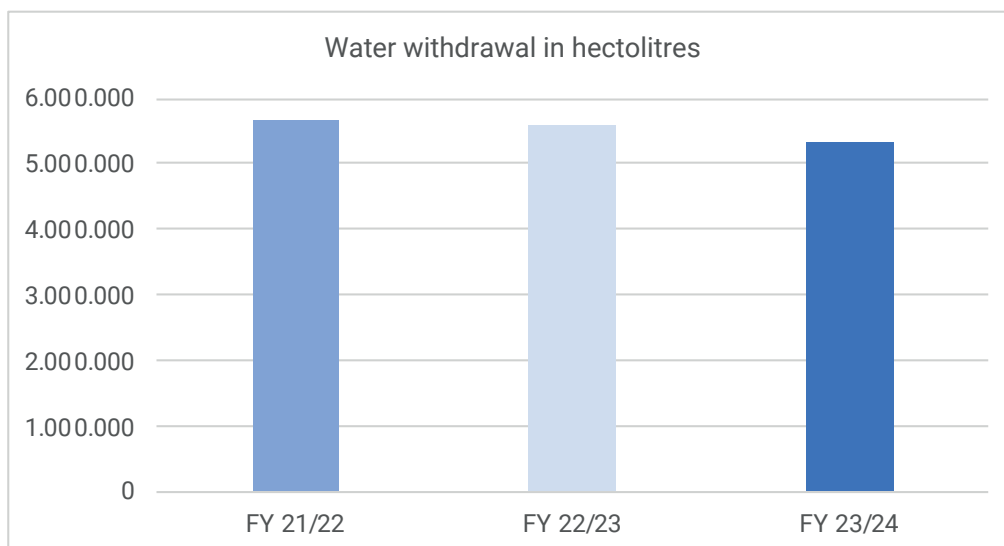
Wastewater discharges into the municipal water network are subject to strict legal monitoring in Germany. Detailed specifications are laid down with regard to possible pollution, which ensure that discharges of process water cannot lead to negative effects on the environment and people. To this end, continuous monitoring is carried out by the local authorities.

At one WDI site, process water is discharged into a watercourse. WDI has received a special water discharge licence for this from the local authorities. There are also strict legal requirements with regard to water quality. Before being discharged into the watercourse, the process water is purified and any pollutants are filtered out. Continuous monitoring is carried out by the local authorities.

303-3

### Water withdrawal

WDI's water withdrawal has developed in absolute consumption figures over the last three financial years as shown in the following chart:



WDI does not produce in areas with water stress.

303-4

### Water recirculation

The amount of water recirculation essentially corresponds to the water withdrawal. The effects of water evaporation during the production process are negligible.

303-5

### Water consumption

There is no water consumption in WDI's production process. Water is mainly used for cooling purposes, meaning that the water withdrawn is essentially the same as the water returned.

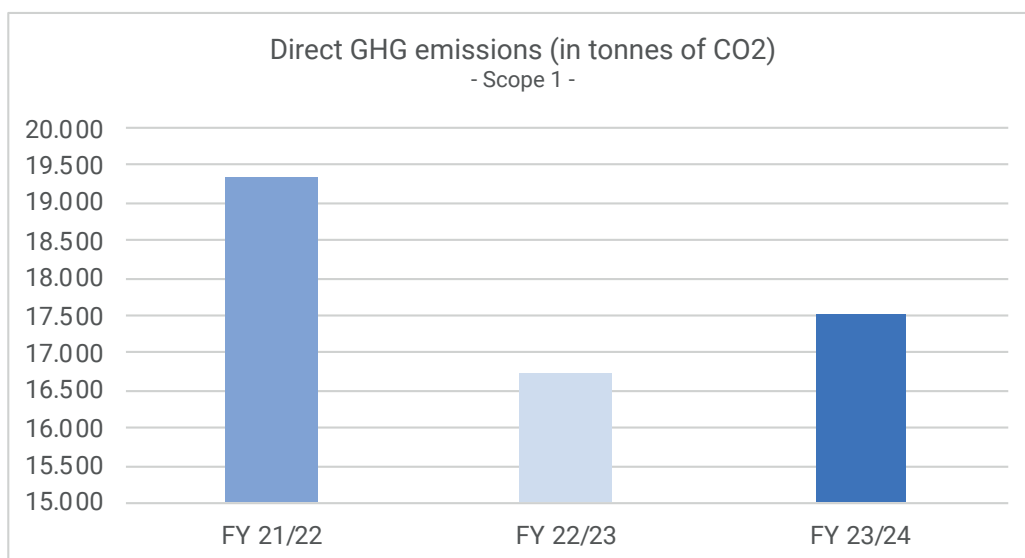
GRI 305

## Emissions

305-1

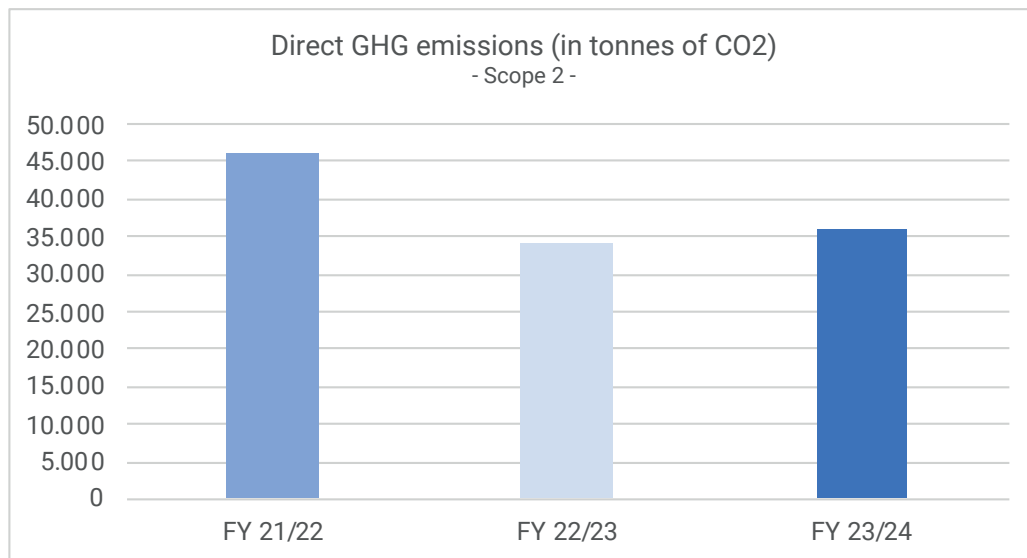
### Direct GHG emissions (Scope 1)

WDI's direct emissions (Scope 1) have developed over the last three financial years as shown in the following chart:



### Indirect energy-related GHG emissions (Scope 2)

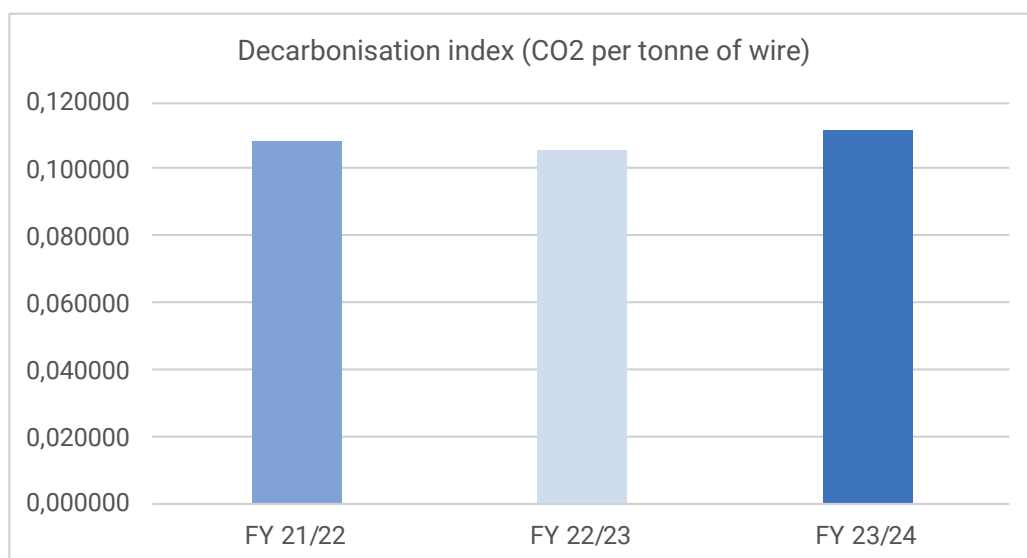
WDI's indirect energy-related emissions (Scope 2) have developed over the last three financial years as shown in the following chart:



### Intensity of greenhouse gas emissions

To calculate the intensity of greenhouse gas emissions, the WDI has introduced a decarbonisation index that represents the emissions per tonne of wire produced.

The following chart shows the development of the decarbonisation index over the last three financial years:



305-5

### Reduction of greenhouse gas emissions

In the reporting year, the following projects were implemented that led to a direct reduction in emissions:

Projects	CO <sup>2</sup> reduction (in tonnes)
Dismantling of the PC03 immersion patent	675
Lighting PC14	86
Photovoltaic system PC14	31

For reasons of clarity, the table only contains the three projects with the largest volume of savings. Further energy-saving projects have been implemented.

GRI 306

## Waste

306-1

### Waste generated and significant waste-related impacts

As a rule, no waste is produced during wire production, as most of the raw materials are can be recycled and packaging materials are of no significant importance. Only during the pickling process are certain chemical products used, which later have to be disposed of as waste. During the pickling process, 4,800 tonnes of hydrochloric acid and 300 tonnes of sulphuric acid were produced in the reporting year.

306-2

### Management of significant waste-related impacts

Waste is stored at WDI in accordance with official requirements and disposed of exclusively by certified disposal companies. This procedure ensures that the impact on the environment and people is not significant.

306-3

### Accumulated waste

The following table contains the quantities of waste generated at WDI

Type of waste / product	tonnes
Hydrochloric acid	1.040
Alkaline pickling solution	260
Sulphuric acid	100

GRI 308

## Environmental assessment of suppliers

308-1

### New suppliers that have been screened using environmental criteria

Suppliers are regularly asked about their compliance with ESG criteria as part of the German Supply Chain Duty of Care Act.

308-2

### Negative environmental impacts in the supply chain and measures taken

No suppliers with significant actual and potential negative environmental impacts were identified during the reporting period.

## 9. Social standards

GRI 401

### Employment

401-1

#### New employee hires and employee turnover

In the reporting year, the company hired 180 employees (wage and salary earners), while at the same time 173 employees (wage and salary earners) left the company. The company does not currently have a breakdown of additions and departures by age group and gender.

The relatively high number of new hires and retirements reflects the current high level of mobility on the labour market. The shortage of skilled labour in the economy as a whole, which is mainly the result of demographic change, is leading to an increase in employees retiring or being poached by other companies at better conditions.

The company sees the continuous improvement of social standards at WDI as an important building block in minimising the effects of demographic change and retaining or attracting skilled workers for the company.

401-2

#### Company benefits that are only offered to full-time employees, but not to employees with fixed-term contracts or part-time employees

All basic benefits offered by the company to full-time employees (wage and salary earners) are also available to employees (wage and salary earners) with fixed-term contracts or part-time employees.

401-3

#### Parental leave

Reconciling work and family life can be a major challenge for employees. In order to support young families in this, the legal regulations in Germany are comprehensive and are expressly endorsed by the company.

The promotion of parental leave and the associated promotion of work-life balance helps to make the company attractive to both existing employees and future applicants. Strengthening this social component also helps to minimise the effects of the shortage of skilled workers.

The following table shows the utilisation of parental leave by employees in the company:

	Female	Male	Other*
Total number of employees who have taken parental leave	3	11	0
Total number of employees who returned to work after parental leave ended within the reporting period	0	11	0
Total number of employees who returned to work after parental leave ended and were still employed twelve months after their return	0	6	0
Return rate of employees who have taken parental leave	0 %	80 %	0%
Retention rate of employees who have taken parental leave	0 %	42 %	0%

\* Gender, as indicated by the employees themselves



**GRI 402****Employer- employee relationship****402-1****Minimum notification period for operational changes**

In Germany, relations between employees and employers are regulated in detail by law. Under the Works Constitution Act and other laws and regulations, the works council is granted comprehensive information and co-determination rights. Timely involvement of the works council and thus the employees in significant operational changes is therefore mandatory.

**GRI 403****Occupational health and safety****403-1****Management system for health and safety at work**

The company's work is based on the guiding principle „Safety before production“. This makes it clear that the safety of our employees and protection against hazards are the top priority at WDI.

In Germany, there are extensive health and safety laws that require a company to introduce a health and safety management system that applies to all employees of the company, but also to employees of other companies who are on the premises on behalf of WDI. The provision of work clothing and personal protective equipment (PPE) helps to reduce hazards in the workplace and prevent accidents.

Each site has an occupational safety specialist. At the two large sites in Hamm and Rothenburg, this specialist is an employee of the company. At smaller sites, WDI has commissioned external companies to fulfil these tasks.

In addition to risk assessments for machinery and production processes, the health and safety management system also includes compliance with legal requirements and internal specifications and guidelines, as well as monitoring regular employee training on occupational health and safety.

Occupational health and safety is a regular part of works meetings so that a direct exchange between employees and employers can take place and relevant information on health and safety can be communicated accordingly.

**403-2****Hazard identification, risk assessment and incident investigation**

The company has a risk assessment for each facility and production process that identifies potential hazards. These risk assessments are available at the workplace and can be accessed by every employee. Annual training sessions ensure that employees are aware of these risk assessments.

If hazardous substances are used in the production process, a data sheet is available for each of these substances, along with appropriate labeling. Employees also receive annual training on this topic.

The occupational health and safety situation in the company is regularly reviewed and critically scrutinised at health and safety committee meetings (ASA meetings). Participants in the ASA meetings are representatives of the employees and the employer as well as, in some cases, the company doctor. The aim of the ASA meetings is to recognise and eliminate potential hazards before an accident at work occurs. Regular inspections of the company are part of the ASA meetings.

In the event of an accident at work, the course of the accident is analysed and measures to prevent further accidents are agreed. The accident investigations are attended by representatives of the employees and the employer and, if possible, the accident victim himself. Every accident resulting in at least three days' absence from work is reported to the employers' liability insurance association and corrective measures are developed.

403-3

### Occupational health services

The employees at each site are regularly monitored by a company doctor. Due to the small size of the company's sites, external sub company to provide the company doctor.

The company doctor is subject to medical confidentiality so that it is ensured that personal data is not passed on to the employer.

403-6

### Promoting the health of employees

Statutory health insurance in Germany guarantees general and comprehensive healthcare for all citizens. In addition to the statutory regulations

WDI promotes preventive healthcare for its employees with the following programmes:

- **Health bonus:** The company has taken out an insurance policy in favour of employees that allows each employee to be reimbursed EUR 300 per year for privately paid healthcare costs. This can be used to reimburse costs such as glasses, hearing aids, dental cleaning and prostheses, massages, medication, etc.
- **Job bike:** Every employee has the opportunity to lease two bicycles through the company. Thanks to subsidies from the company and better tax treatment, bicycles can be purchased more cheaply. The more regular use of bicycles is intended to promote the health development of employees. This measure also makes a further contribution to reducing the CO<sup>2</sup> footprint.
- The Hamm site organises a weekly „back training course“, which is free of charge for all employees.
- Employees who spend the majority of their working day at a desk are entitled to an ergonomically optimised workplace, such as height-adjustable desks.

403-8

### Employees covered by an occupational health and safety management system

All employees of the company, but also all employees of other companies who have been commissioned by WDI and are present on the premises of WDI, are covered by the company's management system for health and safety at work.

403-9

**Work-related injuries**

WDI measures occupational accidents that have led to an interruption of work and are reported to the employers' liability insurance association using the "accident frequency" indicator. The accident frequency measures the number of accidents at work per 1 million working hours and represents an internationally recognised basis of measurement for comparing companies of different types with one another.

The main occupational accidents at the WDI are sprains and contusions with a focus on injuries to the hand, arm and foot. The following table shows the frequency of accidents over the last three financial years:

	FY 21/22	FY 22/23	FY 23/24
Number of accidents at work	71	52	58
Number of hours worked	1.891.468	1.806.465	1.865.786
Accident frequency (based on 1 million working hours)	38	29	31

There were no fatal accidents at work during the reporting period.

403-10

**Work-related illnesses**

There were no work-related illnesses in the reporting year.

GRI 404

**Education and training**

404-1

**Average number of hours for training and further education per year and employee**

The average number of hours spent on training and development per year and employee was 5.8 hours.

404-2

**Programmes to improve employee skills and transition assistance**

The average number of hours of participation in skills improvement programmes per year per employee was 1.8 hours.

404-3

**Percentage of employees receiving regular performance and career development reviews**

The company does not regularly assess the performance of employees or their professional development.

GRI 405

**Diversity and equal opportunity**

405-1

**Diversity in governance bodies and among employees**

WDI employs staff (wage and salary earners) from around 30 nations. However, the company does not keep separate statistics for this.



## **GRI 413 Local communities**

### **413-1 Operations with local community involvement, impact assessments and support programmes**

WDI's operating sites are primarily integrated into the local communities through direct economic and financial processes, such as the remuneration of employees, tax payments by the company to municipalities, employment of local companies, etc.

Other possible integrations that might have negative impacts on the economy, environment, and people are subject to strict legal regulations in Germany. Additionally, local communities have the opportunity to report any negative impacts at any time via a complaint hotline.

No negative impacts on the local communities were reported during the reporting year.

### **413-2 Operations with significant or potential negative impacts on local communities**

The company's business activities had no negative impact on local communities in the reporting year (see notes GRI 413-1).

## **GRI 414 Social assessment of suppliers**

### **414-1 New suppliers that have been screened using social criteria**

All major new suppliers are checked against social criteria in accordance with the requirements of the German Supply Chain Duty of Care Act. Due to WDI's stable supplier situation, there were no new suppliers that generated significant sales with WDI in the reporting year.

### **414-2 Negative social impacts in the supply chain and actions taken**

Due to the requirements of the German Supply Chain Duty of Care Act, the key stakeholders in WDI's supply chain were audited. There were no indications of negative social impacts.

## **GRI 415 Political influence**

### **415-1 Party donations**

In the reporting year, the company did not make any donations to political parties in the form of financial contributions or donations in kind.

## **GRI 416 Customer health and safety**

### **416-1 Assessment of the health and safety impacts of different categories of products and services**

Regular quality control of our products as well as comprehensive incoming and outgoing inspections ensure a consistently high level of quality for our products, so that any negative impact of our products on the health and safety of our customers is considered to be minimal.

### **416-2 Offences related to the health and safety impacts of products and services**

No violations were identified during the reporting period.



## GRI 417

## Marketing and labelling

## 417-1

The requirements for product information vary from customer to customer due to customer-specific requirements. The company is able to fulfil 100% of all customer requirements with regard to product information.

417-2

No violations were identified during the reporting period.

## 417-3

No violations were identified during the reporting period.

## GRI 418

## Protection of customer data

## 418-1

No complaints regarding breaches of customer data protection and the loss of customer data were identified during the reporting period.

## GRI Index

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<b>GRI 203</b>	<b>Indirekte ökonomische Auswirkungen 2016</b>		
GRI 203-1	Infrastructure investments and subsidised services		The company neither invests in public infrastructure nor does it provide subsidised services.

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
GRI 203-2	Significant indirect economic impact		The company neither invests in public infrastructure nor does it provide subsidised services.
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<b>GRI 304</b>	<b>Biodiversity 2016</b>		
GRI 304-1	Owned, leased, and managed operating sites that are located in or next to protected areas and areas with high biodiversity value located outside protected areas		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-2	Significant impacts of activities, products, and services on biodiversity		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-3	Protected or renaturalised habitats		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-4	Species on the Red List of the World Conservation Union (IUCN) and on national lists of protected species that have their habitat in areas affected by business activities		WDI does not have operating sites that are located in areas with high biodiversity
<b>GRI 305</b>	<b>Emissions 2016</b>		
GRI 305-1	Direct GHG emissions (Scope 1)	20	
GRI 305-2	Indirect energy-related GHG emissions (Scope 2)	21	
GRI 305-3	Other indirect GHG emissions (Scope 3)		No data is currently available from the upstream and downstream value chains
GRI 305-4	Intensity of greenhouse gas emissions	21	
GRI 305-5	Reduction of greenhouse gas emissions	22	
GRI 305-6	Emissions of ozone-depleting substances		WDI does not produce, import or export any ozone-depleting substances
GRI 305-7	Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions		WDI has no such significant air emissions

GRI-Standard	Specification	Page	Reason for omission
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GRI 306-5	Waste forwarded for disposal		Not relevant for WDI, see GRI 306-1; 306-2 and 306-3
<b>GRI 306 Waste Water and Waste 2016</b>			
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<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
GRI 403-5	Employee training on health and safety in the workplace		Explanations are already listed in 403-2
GRI 403-6	Promoting the health of employees	25	
GRI 403-7	Prevention and mitigation of impacts on occupational health and safety directly related to business relationships		The general laws in Germany apply here
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**Westfälische Drahtindustrie GmbH**

## Sustainability Report

in accordance with the GRI Standards

2024