

Contents

No.	Chapter	Page
1	Foreword: Sustainability in a changing world	2
2	Company management	3
2.1	Key figures on sustainability	
2.2	Areas of action	4
2.3	Sustainability policy	
2.4	Organisation	5
2.5	Customer orientation	
2.6	Leadership	6
2.8	Structure of management systems	7
3	Human rights and working conditions	
3.1	Apprenticeships and training	8
4	Right to occupational health and safety	
5	Business ethics	9
5.1	Corporate culture	
5.2	Fair operating and business practices	
5.3	Anti-corruption, money laundering, tax system, property, political participation	10
5.3.1	Combating corruption	
5.3.2	Money laundering	
5.3.3	Taxation	
5.3.4	Ownership/financial Responsibility	
5.3.5	Political participation	11
5.3.6	Freedom of association	
5.4	Use of public and private security forces	
5.5	Respect	
5.6	Diversity as an opportunity	
5.7	Ethical recruitment and inclusion	
5.8	Ethical principles for artificial intelligence	12
6	Environment and energy	
6.1	Land, forest and water rights, and forced eviction	
6.2	Biodiversity, land use and deforestation	13
6.3	Animal welfare	
6.4	Noise emissions	
7	Responsible supply chain management	14
7.1	Responsible procurement of raw materials	
8	Community involvement	15
8.1	Consumer concerns	
8.2	Stakeholders	16
8.3	Managing risks	
8.4	Data protection and information security	17
9	SDGs – Index	19
10	ESRS – Index and SDG / ESRS Matrix	21
11	Locations	22

1 Foreword: Sustainability in a changing world

Dear reader,

Since the last version of our sustainability policy was published, our group has changed, as has the environment in which we work.

Since then, Hanomag has grown continuously, while our environment has increasingly been characterised by uncertainty. Today we face a changed society, a tense political environment and ever-accelerating climate change. We view these developments with concern, but in many areas we also see them as an opportunity to improve.

Our drive, therefore – especially in an era of uncertainty – is to be a reliable partner for our customers, a secure employer for our employees, and a competent ally for our environment. More than ever, with our heat treatment processes and mechanical processing of steel and aluminium, we aspire to significantly improve the service life and reliability of components from a wide range of product areas, thereby making an essential contribution to product longevity. In doing so, we work in compliance with the law, at the forefront of technology and with suppliers who also operate within this framework.

This is only possible because the people who work with us apply their knowledge and skills every day to keep quality for our customers high and the risks for our surroundings and the environment low. We take responsibility for these people, because we encourage and challenge them.

In the new version of this policy, we describe for our customers, our employees and readers who are interested in our company for other reasons how social interaction works at Hanomag. Furthermore, we set out the principles that guide our actions and how we position ourselves on the key issues of our time.

This guideline is our compass for staying on course amid ongoing change and for being a reliable, ambitious and flexible company for our partners.

Thank you for engaging with our Sustainability Compass and accompanying us on our journey.

Hanover, 5 March 2025



Dipl.-Ing. Karsten Seehafer
Owner



Dipl.-Oec. İlhami Günay
Managing Director



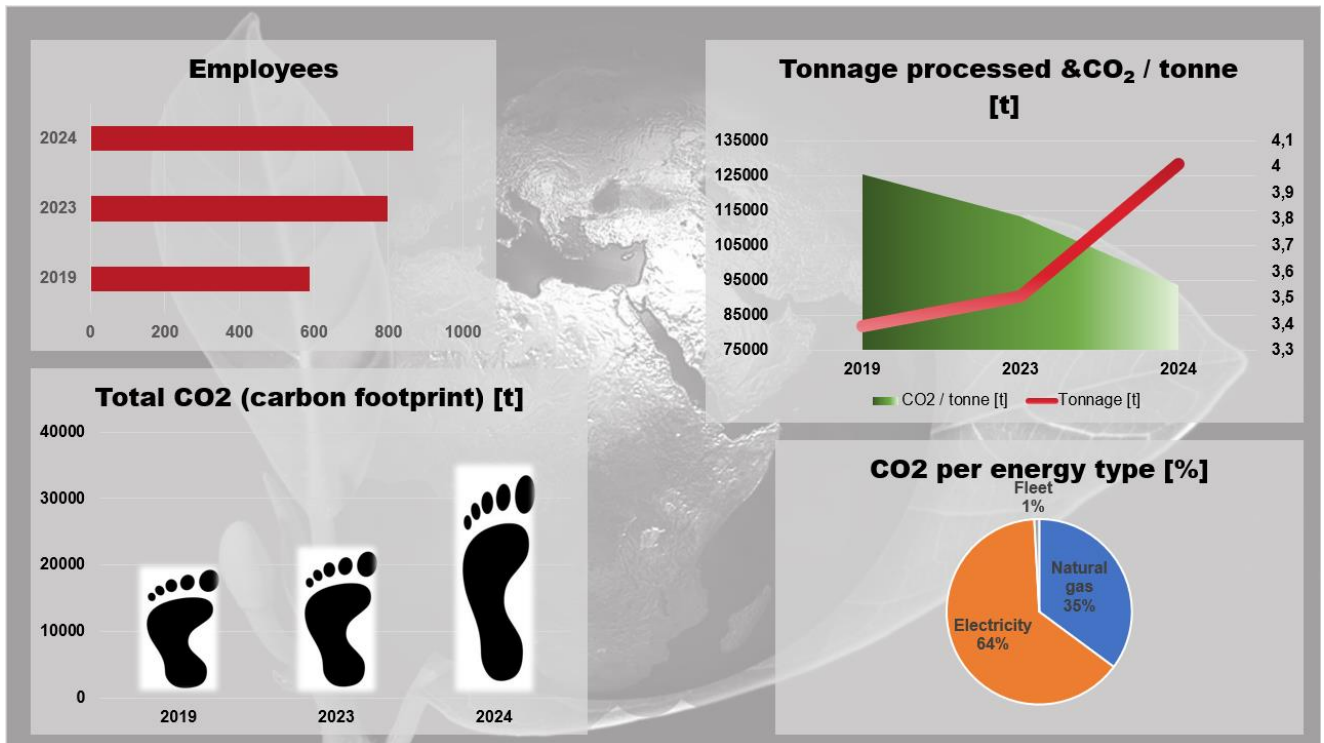
Dipl.-Wi.Jur. (FH) Klaas
Gerrit Zettelmeier
Managing Director

What we do today determines what the world will look like tomorrow

Marie von Ebner-Eschenbach

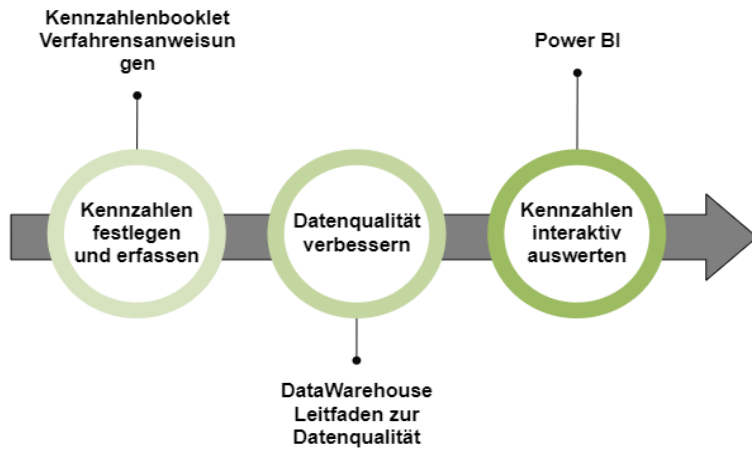
2 Company management

2.1 Key figures on sustainability



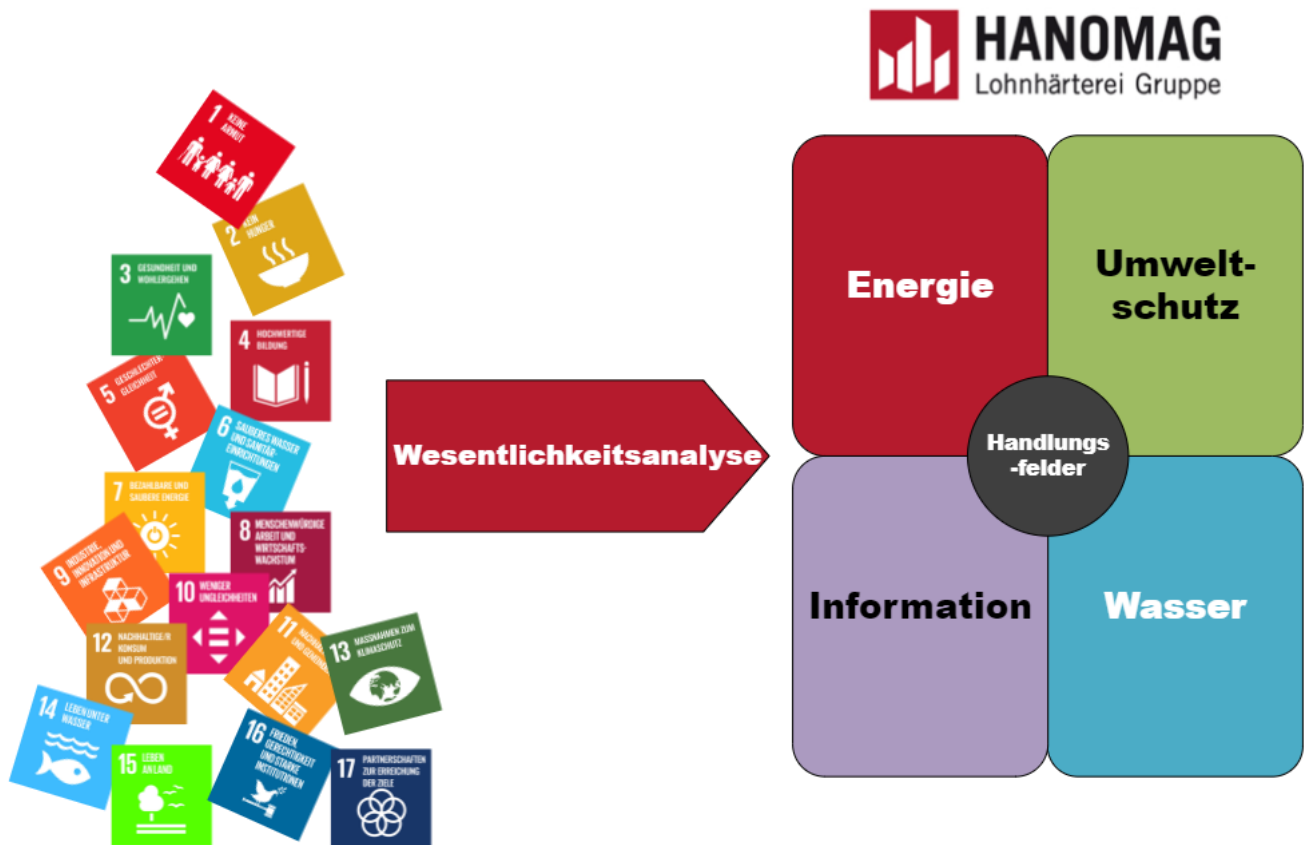
At the Hanomag Lohnhärterei Group, numerous key figures from all areas of management are recorded, evaluated and translated into measures. We have published procedural instructions for energy monitoring and for recording environmental key figures.

In a key figures booklet, we describe all company key figures, the frequency with which they are collected, and the data sources from which they originate.



We have initiated measures to increase the quality of the data obtained, with the aim of evaluating and presenting key figures using Power BI wherever possible. By means of dynamic linking, we obtain a faster and more objective overview and can make better decisions for ourselves and our customers.

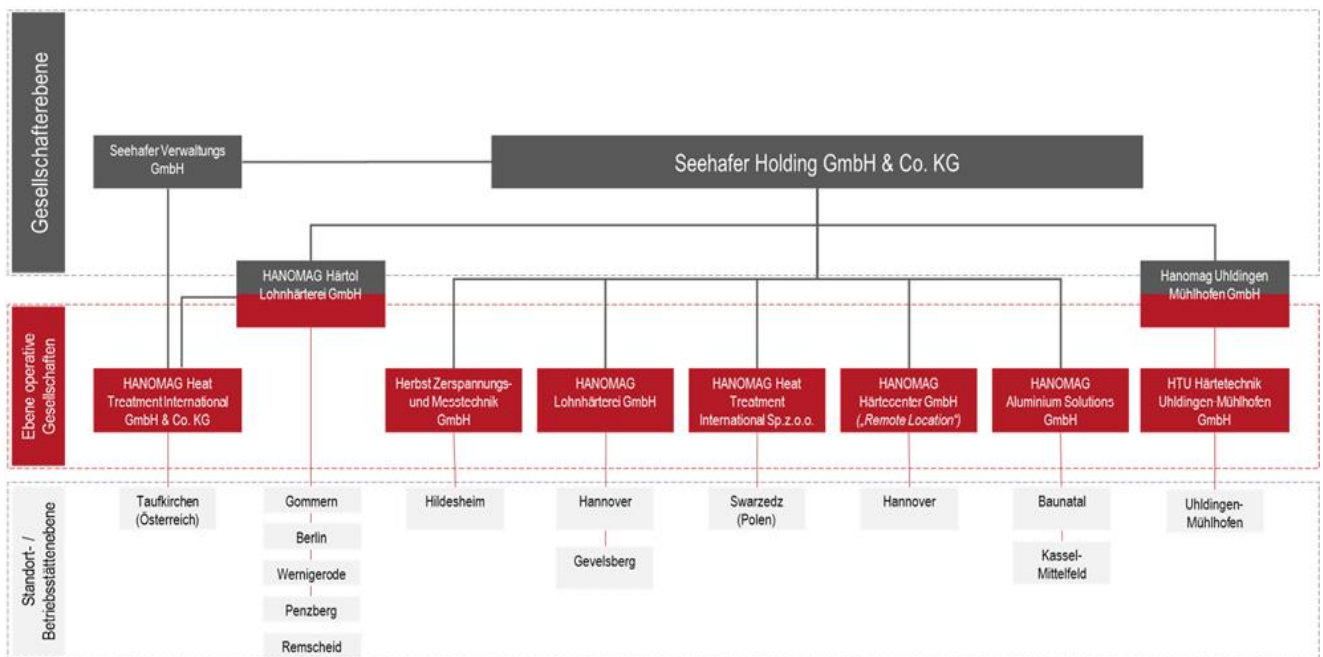
2.2 Areas of action



2.3 Sustainability policy



The Hanomag Lohnhärterei Group enjoys a good reputation among its customers in relation to the company's trust-worthiness, which is based on the fact that it conducts its business systematically and continuously with the highest level of integrity and in compliance with the laws and regulations applicable to its activities. Business success depends on building and maintaining the trust of customers, employees, government agencies and the public. We have therefore established basic principles for our actions, which enable all employees of the Hanomag Lohnhärterei Group to expand this trust within their framework and to translate it into responsible, customer-oriented actions. The social responsibility of our group is based on three pillars: respect, dialogue and leadership. Based on these principles, the rules set out in our Code of Conduct and our management systems, we are constantly developing our corporate culture.



2.4 Organisation

The organisation of the group is divided into the shareholders, the head office and the respective locations. The activities are regulated and supported by various management systems. In some places, we use the expertise brought by external professionals to safeguard and improve our performance.

As our group has grown since the last guideline was issued and a number of new locations and product areas have been added. We have redefined both the structure and the division of tasks and published them in a new organisational chart. The organisation also includes the areas management systems, customer orientation and leadership, which will be explained in more detail below.

2.5 Customer orientation

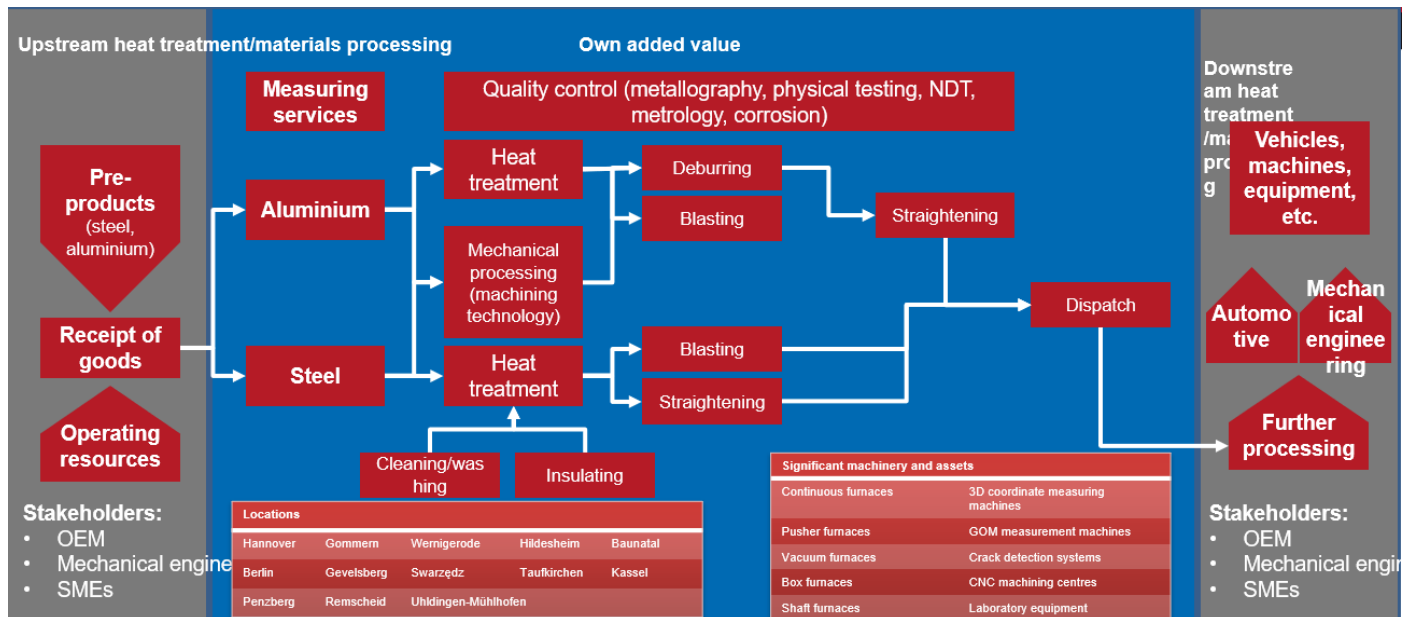
We work for our customers. We use our knowledge, our strength and our means, to meet the high expectations of our customers on a long-term basis. Our goal is to be the best partner for our customers in the fields of heat treatment, mechanical processing and assembly, as well as measurement services.

To achieve this goal, we primarily need committed and qualified employees, in addition to state-of-the-art technology and functioning management systems.

We work closely with our customers, to develop exactly the kind of heat processes our customers need. In addition, we undertake activities, which make it easier for our customers to achieve their goals, especially in terms of quality assurance and logistics. The business sectors of our customers differ from each other. At Hanomag we therefore try to understand each individual customer's specific needs to find the best solution. The basis of our customer orientation is the commitment of every person involved, as well as responsible thinking and acting. Our competence, our values and our behaviour contribute to the success of the Hanomag Lohnhärterei Group.

A customer is not an interruption of our work. They are the purpose of our work.

Mahatma Gandhi



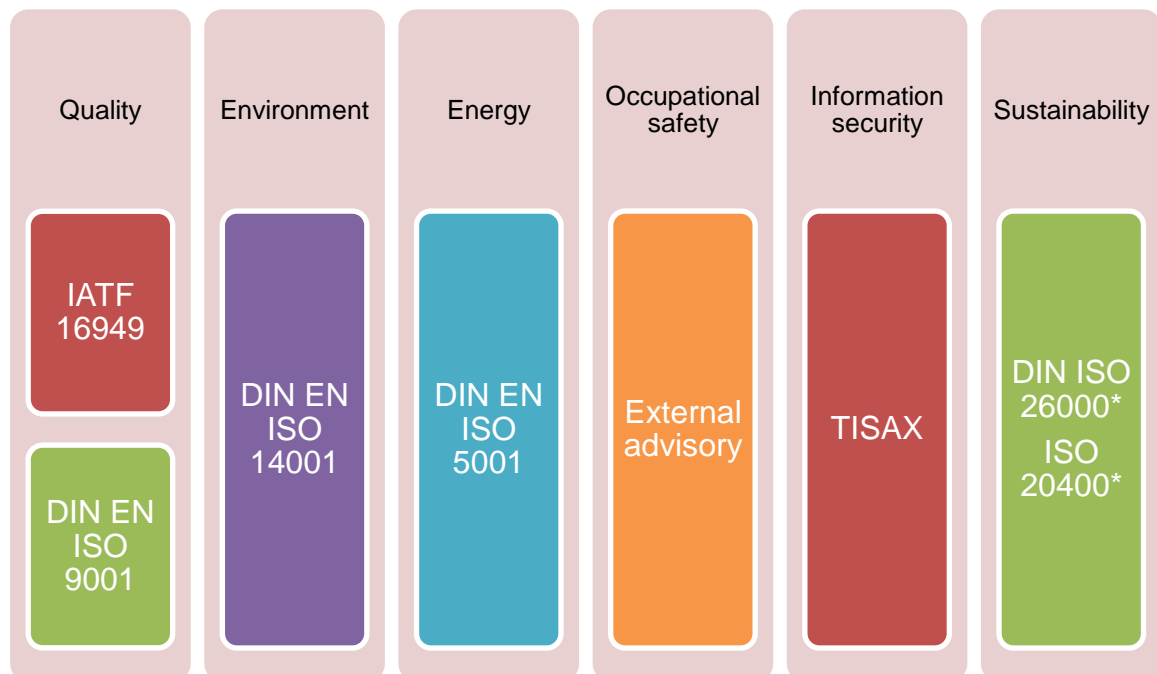
2.6 Leadership

The managers in our group are responsible for upholding the regulations described here. For this reason, we place high demands on the leadership and communication skills of our management staff. For us, leadership means achieving goals. We reject any form of child or forced labour. Legal employment of minors does not take place at night or involve, overtime, but only under working conditions that protect their health, safety and development. Managers must work to earn and deserve the trust of their employees. We expect supervisors to serve as role models for their teams. They own up to their mistakes and take responsibility. True leadership requires the willingness and courage to make decisions in the interests of the Group and to stand by them. This reliability and continuity is part of our responsibility towards our employees. We expect managers to recognise good performance and to provide timely, constructive feedback during discussions. We rely on managers to treat information as confidential in terms of its nature and content. For this reason, we place high demands on the leadership and communication skills of our management staff. We guarantee data protection and handle personal data in accordance with legal requirements. Furthermore, leadership responsibility also means that behaviour detrimental to the company, criminal acts, grievances and special risks are reported internally. Employees and external stakeholder groups who report such incidents must not be disadvantaged in any way. In emergencies, managers ensure the coordination of evacuation and rescue measures and act in accordance with our emergency plans.

Setting an example is not the main means of influencing others. It is the only means!

Albert Schweitzer

2.7 Structure of management systems



*For guidance, not a certification

Our business activities are built on a chain of management systems. As a result, we speak the same language as our customers in terms of quality, are constantly improving our energy-related and

environmental performance and are ensuring high standards in the field of occupational safety. Our measures in the areas of CSRD and procurement are based on DIN ISO 26000 and ISO 20400.

3 Human rights and working conditions

Our Group operates in Germany, Poland and Austria – three countries in which human rights are guaranteed and protected. However, we are well aware that, with regard to the different cultures within our company and when deciding to cooperate with customers and suppliers, we must carefully examine our decisions. Our Code of Conduct excludes any cooperation with organisations that violate fundamental rights. To delve deeper into the topic and to sensitise our managers and employees to grievances or even possible complicity, we particularly highlight the following principles:

We reject any form of child labour and/or forced labour. The lawful employment of minors does not take place at night or involve overtime, and working conditions protect their health, safety and development. We do not work with customers or suppliers who disagree with these points or whom we know operate in countries where child and/or forced labour is tolerated. Our core values are based on our constitution.

We do not accept any anti-constitutional, racist, religiously extremist or otherwise inhumane statements or activities of any kind being made or carried out on our premises. Calls for violence against individuals or groups are reported to the police without delay. Further regulations on our social responsibility are enshrined in our Code of Conduct.

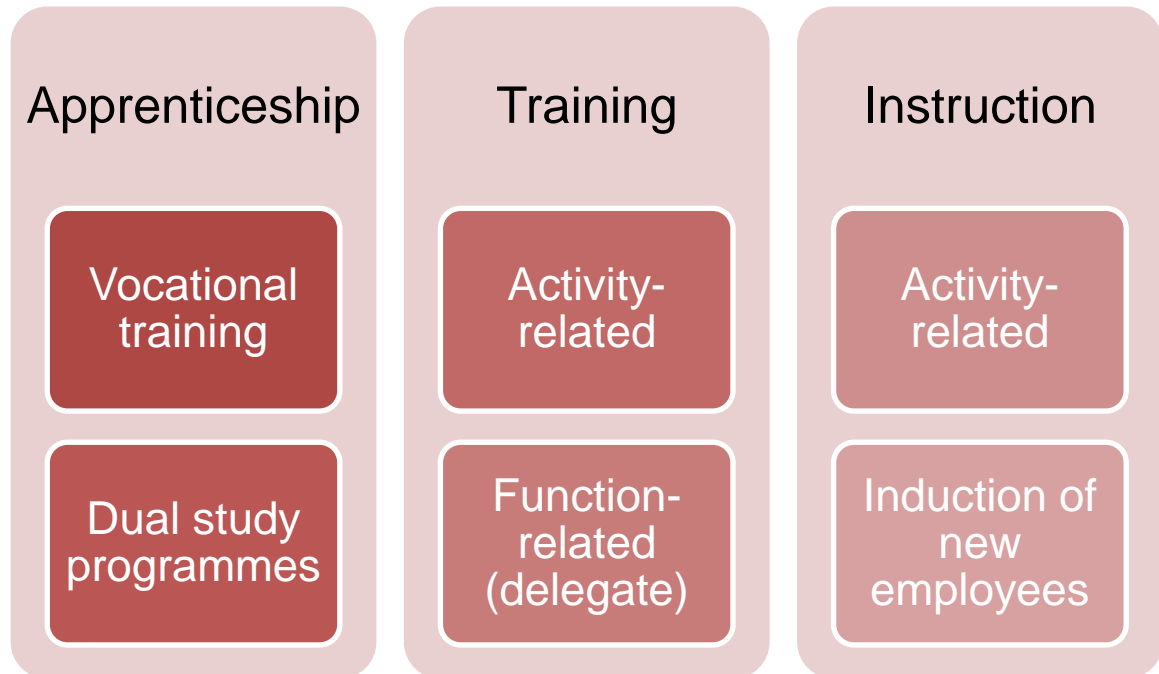
3.1 Apprenticeships and training

For us, social responsibility also means qualifying our employees for the tasks we entrust them with. We do this as a training company, through study-practice models and in further training our employees in relation to their tasks.

We document and track the qualifications of each employee. When someone takes on a new role or joins us, we compare their existing qualifications with our requirements profile and draw up a training/induction plan.

A series of training courses and instructions specified in our training management system are mandatory for all employees of the Group. These include initial and safety training, instruction in our rules of conduct and sustainability, and orientation of external companies to our operating regulations.

We give everyone who works with us or for us the best possible tools for each of their tasks.



4 Right to occupational health and safety

Safety, especially in the area of heat treatment, is not just another subject matter, but the subject matter par excellence. High temperatures, process chemicals, floating loads and electrical hazards are just some of the risks we are dealing with. Our aim is to consistently identify the risks for all people present at our sites, to analyse and minimise them. Hanomag avoids materials and methods that pose risks to the environment and health, where appropriate alternatives are available. Among other things, we rely on responsible chemical management with a focus on substitution. Together with our external consultants, we create risk analyses, which we update as needed. Return to work meetings after accidents at work give us an insight into the causes and occurrence of the respective accident. We are thus able to apply specific technical or organisational solutions or influence the behaviour of any employees at risk. Through our operating regulations, we ensure that all relevant information is available to third parties for safe working at our premises.

An ounce of prevention is worth more than a pound of cure!

Benjamin Franklin

5 Business ethics

5.1 Corporate culture

Our culture demonstrates how we work together, how we interact with each other, and how we behave internally and externally. Every employee, regardless of their role and direction, acts as an ambassador for our company. This task is not always easy, because the subject matter that someone from the Hanomag family is supposed to represent to customers, authorities, media or the public can be very complex. We respect that each of us copes with their tasks in their own way using their qualifications and personality. This is exactly what our culture is about: respect, dialogue and leadership. It's about focusing on our customers. Building trust and driving change forward. The corporate culture of the Hanomag Lohnhärtereier Group promotes the responsibility of the individual in a result, which ultimately convinces our customers. We understand that this form of cooperation is the driving force behind our company's success. That is why we strive to implement these principles at all of the group's locations. We are still at the very beginning and are aware that each site has grown from a different historical and cultural basis. Part of this culture is also, that we assume social responsibility. We have a special passion for water sports. Whether through different roles or by taking part in events, they represent for us a sense of togetherness and belonging that extends beyond the workplace. The corporate culture is important in relation to the Group's sustainable growth. Unlike our technologies, strategies and organisational structures, it is the constant fingerprint of the Hanomag Lohnhärtereier Group. It guides us to be an attractive employer, reliable business partner and innovative technology leader in the fields of heat treatment, mechanical processing, assembly and measurement services.

5.2 Fair operating and business practices

The Hanomag Lohnhärterei Group is committed to:

- complying with applicable laws and regulations
- demonstrating and promoting their commitment to responsible business practices in regard to instructions, decisions and activities
- incorporating the principles of this directive in regard to important processes

The Hanomag Lohnhärterei Group prefers to cooperate with suppliers, consultants and other business partners, who agree to these principles.

The Hanomag Lohnhärterei Group measures itself against its competitors in a fair and integral way. The Company does not enter into any agreements or arrangements with competitors, customers or suppliers, which unduly affect the market. The Hanomag Lohnhärterei Group gains information about its competitors through legitimate methods.

The reports are transparent, truthful and timely with the aim of presenting the company's performance in a realistic manner.

Our conduct within the market, towards the company and towards our employees is governed by our Code of Conduct, which we also make available on our website for our partners and the public, should they be interested.

The topics presented under this core theme are taken from our Code of Conduct, which also contains other topics such as:

- Further business principles, e.g.:
 - Marketing and sales
 - Fair competition practices / antitrust law
 - Intellectual property and information protection
 - Accounting and reporting
- Social responsibility
- Environmental principles
- Reporting violations (whistleblowing)

The chapter on supplier management is listed separately because this area is currently undergoing significant change and development due to the new issue of important standards in the area of management systems. The "Quality, Environment and Energy Directive" is also an important applicable document with corresponding requirements for the entire supply chain.

5.3 Anti-corruption, money laundering, tax system, property, political participation

5.3.1 Combating corruption

The Hanomag Lohnhärterei Group shall not participate in or endorse any corrupt practices. Employees of the Company may not accept payments, gifts or other forms of remuneration from third parties, which could actually or appear to affect the objectivity of their business decisions. In principle, this is not the case with gifts and invitations, which are within the framework of customary business hospitality, custom and courtesy.

5.3.2 Money laundering

The Hanomag Lohnhärterei Group shall not accept, facilitate or support money laundering.

5.3.3 Taxation

Our Company shall comply with the tax laws and regulations of each country in which it operates.

5.3.4 Ownership/Financial Responsibility

We respect the material and intangible property of the company, which serves to achieve our goals. It is used within the framework of operational regulations.

Export controls/economic sanctions

Our company undertakes to comply with trade control laws.

5.3.5 Political participation

The Hanomag Lohnhärtereier Group is neutral with regard to political parties. We exercise political influence through our cooperation in our interest associations. The main focus is on participation within the Wirtschaftsverband Stahl und Metall e.V. (WSM – German Steel and Metal Association) and the Arbeitsgemeinschaft Wärmebehandlung und Werkstofftechnik e.V. (AWT – German Association for Heat Treatment and Materials Technology).

5.3.6 Freedom of association

Regarding our employees, we respect the right of all employees to join in an association, to represent their interests as employees, and to organise themselves and negotiate collectively or individually.

5.4 Use of public and private security forces

We do not work with security service providers to protect our properties. Should a situation arise that requires the assistance of private or public security forces, any use of excessive force, torture or violation of freedom of association and coalition is absolutely unacceptable.

5.5 Respect

All employees shall be treated with respect. Discrimination, physical or verbal harassment or unacceptable threats will not be tolerated. We take our people seriously. We recognize each other and value each other. We treat each and every one of us with respect. Respect is the foundation of all relationships. Only those, who feel respected develop strength and take responsibility. Mutual respect is the basis for working with colleagues, managing dialogues with managers and dealing with suppliers and customers. We trust each other that everyone understands and executes their part. We acknowledge the contribution of each individual and promote their initiative. We actively listen, support and learn from each other and with each other.

5.6 Diversity as an opportunity

We see diversity as an opportunity, because we are all individuals with very different experiences and abilities. Each of us wants to be treated with respect, to achieve our goals in the interest of our customers in relation to our work and mission.

People from many different nations are employed with us. The Group is therefore also a reflection of the cultures in this world.

We consider differences as an advantage, and diversity as a strength. It helps to increase our productivity, collaborations and innovation. It helps us to look at problems from a wide range of perspectives and to find excellent solutions.

We fully recognise the rights of indigenous peoples. In the countries in which the Hanomag Lohnhärtereier Group operates, national minorities are legally recognised and protected.

5.7 Ethical recruitment and inclusion

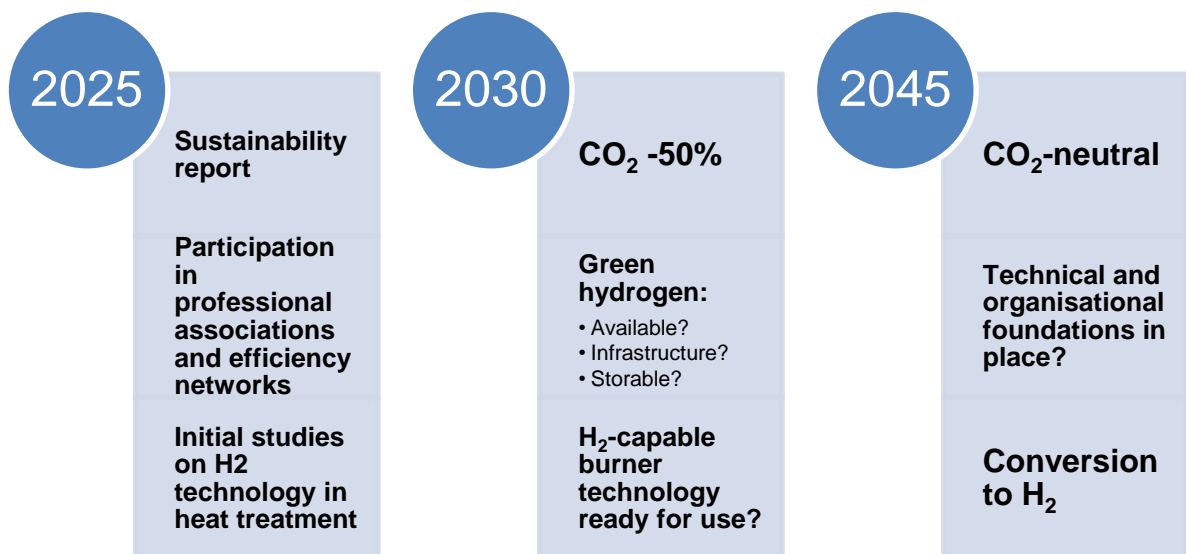
At the Hanomag Group, employees are selected regardless of their ethnic origin, skin colour, gender, religion, nationality, sexual orientation, age, disability, social background or political views. The only deciding factor is their qualifications for the tasks at hand. We respect the equality of all people and strictly reject any form of discrimination.

5.8 Ethical principles for artificial intelligence

We follow the UNESCO recommendation on the ethics of artificial intelligence when evaluating AI-supported work processes. We use AI to evaluate business data (business intelligence). The following principles are decisive for us:

- AI must respect, secure and promote human rights,
- AI must be publicly monitored,
- AI must contribute to social diversity,
- Ethical (and legal) guidelines must be adhered to throughout the entire life cycle of AI systems,
- AI must contribute to achieving the SDGs,
- AI must not circumvent or violate data protection rules.

6 Environment and energy



The services and processes of the Hanomag Lohnhärterei Group are aligned in such a way that energy, natural resources and raw materials are used efficiently, and waste and residual materials are minimised or reused. This is intended to keep environmental impacts (emissions such as greenhouse gases) on air, soil and water as low as possible

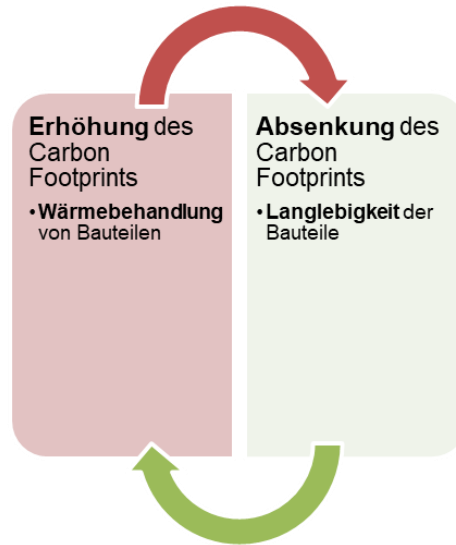
Heat treatment procedures naturally require a lot of energy. Any waste of energy may lead to considerable costs for us. This would be money, which we cannot spend on our employees or on improving our infrastructure.

For these reasons, we have established an energy and environmental management system. In order to improve our energy and environmental performance, consumption is recorded, individual consumers are identified and suitable efficiency measures are planned and implemented in a targeted manner.

We know that in these considerations we are still a long way from exhausting all possibilities. Therefore, we continue to work on analysis and savings opportunities. We organise work on these matters in the form of projects that affect either the entire Group or individual locations.

In practical terms, this means that we operate manual or automated energy data collection and record the consumption of raw, auxiliary and operating materials through to disposal at all locations, thus monitoring the entire system. To meet the worldwide focus on reducing greenhouse gases, we are currently working on developing the Hanomag Lohnhärterei Group's CO₂ accounting (carbon footprint).

The current topic of alternative drive systems is also taken into account for managing our entire vehicle fleet.



6.1 Land, forest and water rights, and forced eviction

We reject any withdrawal of land, forests and bodies of water, as well as forced evictions, in all business activities. We expect the same from our business partners, regardless of the relationship we have with them.

6.2 Biodiversity, land use and deforestation

In our view, the reduction in biodiversity is a direct consequence of deforestation and the overuse of land and water. We avoid any extensive land use in our activities. The operating and hazardous materials we use are monitored and substituted wherever possible. Hazardous waste is continuously reduced and disposed of in accordance with applicable regulations. When establishing or acquiring new parts of the company, we strictly comply with all applicable regulations, especially those in protected areas.

6.3 Animal welfare

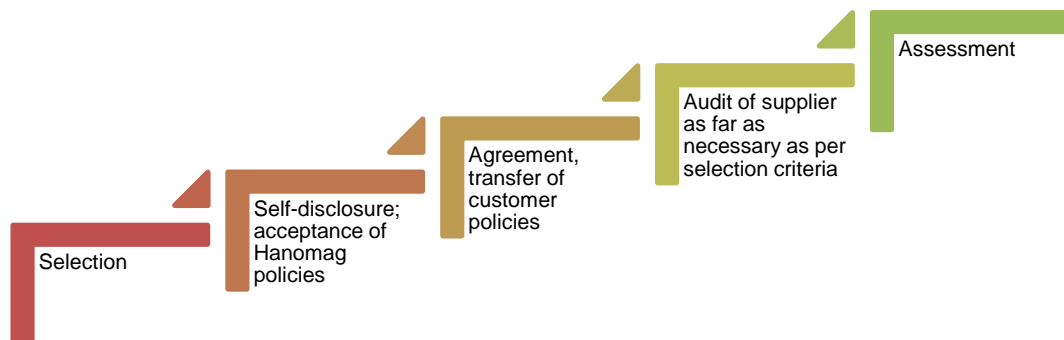
Our business area covers the heat treatment and mechanical processing of metallic materials. Activities that compromise animal welfare are not part of our business. Our values require all employees of the Group to comply with all national and international legal standards on animal welfare and protection.

6.4 Noise emissions

Noise is a widespread stress factor and a possible cause of sleep disorders and cardiovascular diseases. We have therefore implemented measures at all the Hanomag Group's locations to reduce noise internally and externally. Wherever noise levels are high, we apply regulations and technical solutions for hearing protection and emission control.

7 Responsible supply chain management

We pay particular attention to the Group's suppliers. The functionality, quality and reliability of our range of services in the areas of heat treatment, mechanical processing, assembly and measurement services depend on their supplies and services.



The Group's success rests in no small part on the collective strengths we harness through collaboration with our suppliers. For this reason, we work with suppliers that suit Hanomag and with whom we aim for long-term, extendible supply relationships. This common approach also involves selecting and developing suppliers according to certain rules. After all, we can only meet our customers' requirements with suppliers, that meet our requirements. We rely on a systematic system, which has proven itself in cooperation with our suppliers, but which also adapts to a changing environment using appropriate steps. The following guidelines apply to all suppliers: quality, environmental and energy guidelines, our operating regulations and our Code of Conduct. We expect them to comply with these guidelines and, beyond that, to demand and implement them throughout the supply chain.

By means of a self-disclosure, we determine which capabilities, resources, information security and management systems a supplier has. Suppliers of the Hanomag Group must demonstrate at least one certification according to DIN EN ISO 9001. Implementation of an environmental management system will lead to preferential treatment during the selection process. If both are not the case, but a supplier is of high importance to Hanomag, we carry out supplier audits and follow the respective improvement measures. Suppliers who meet these requirements will receive an authorisation.

7.1 Responsible procurement of raw materials

The Hanomag Group has put regulations in place for energy- and environment-related procurement that enable the appropriate procurement of raw materials in accordance with current guidelines and limited to the necessary quantities. The procurement of operating resources complies with the EU's Eco-design Directive. When selecting new suppliers, a comprehensive assessment is carried out based on energy, quality and environmental criteria. If our partners in the upstream value chain have their own sustainability reports or codes of conduct, we use these to check whether the principles described here are also documented in these reports.

8 Community involvement

Hanomag Lohnhärtereier Group demonstrates its social commitment primarily by supporting sports clubs and community events. Shareholders and staff alike take part in water sports and help promote them in diverse ways.

The second pillar consists of cooperation with associations, universities and institutes active in the field of heat treatment, mechanical processing and assembly. This is often about improving work and plant safety. In co-operation with suppliers and regional initiatives, we discuss measures, to reduce electricity and gas consumption and thus reduce CO₂.

Furthermore, the work with the associations and universities is aimed at developing existing or new technologies for heat treatment. Emphasis should be placed on the working group (working group Wärmebehandlung + Werkstofftechnik e. V.) with the Institute for Materials Technology. Here, our company is represented on the Board of Management and the Scientific Advisory Board. We are also involved in the further development of materials technology through our cooperation with the Forschungsvereinigung Antriebstechnik e.V. (FVA). This commitment is underlined by two patents in heat treatment technology. Several of our employees study models in study practice and thus bring new knowledge to the company. We also support courses, which are not necessarily related to heat treatment or mechanical processing.

In terms of our impact on society, we distinguish between two perspectives: contextual observation and our stakeholders.

The former includes our mission statement, the corporate culture, CSR, our services, our employees and our know-how. This is about our internal community.

The observation of our stakeholders focuses on our environment, deals with authorities, municipalities, our customers, market companions, trends, the state of the art, associations and the people with whom we meet outside our day-to-day business here at Hanomag.

8.1 Consumer concerns

The Hanomag Lohnhärtereier Group shall present its products and services accurately and shall comply with applicable regulatory and legal requirements. The company does not make false statements or provide misleading information about its products or services. These include safety and environmental aspects.

We present the range of heat treatment, mechanical processing, assembly and measurement services on our website in a generally accessible manner.

To clarify the respective environmental impact and resource consumption, we determine specific key figures, which mostly relate to one tonne of heat-treated or processed components. We are currently able to make statements about electricity and gas consumption, CO₂ emissions and waste volumes.

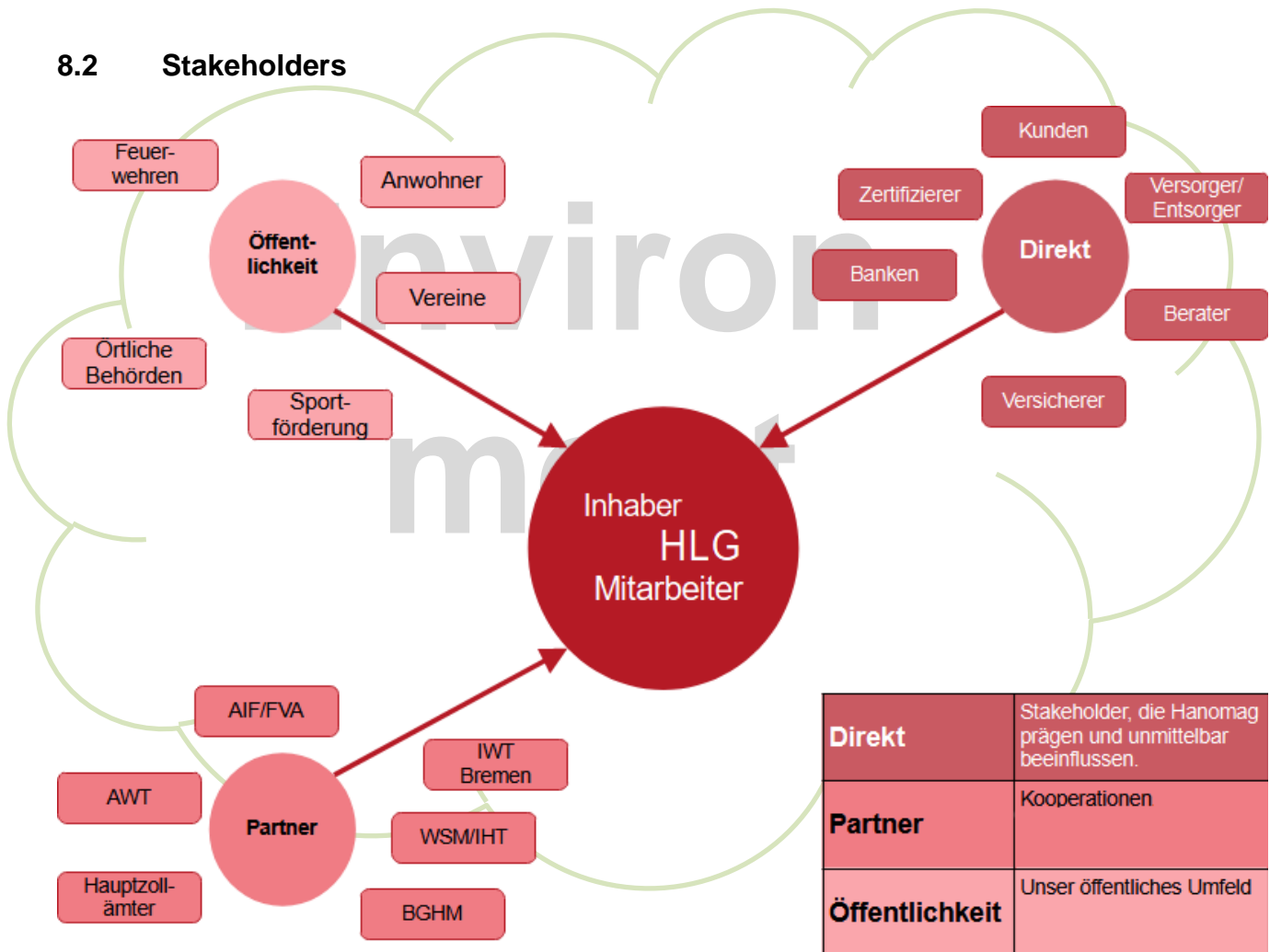
However, the focus of our customers is on the constant quality of our service processes. This aspect is directly linked to product safety. The aspect of quality at Hanomag therefore also indirectly refers to the safety of end users. We focus on this, because we can only carry out evaluations of value chains and life cycles within very limited horizons, since we ourselves are always part of our customers' value chain.

We have implemented company-wide quality management systems according to IATF16949 or DIN EN ISO 9001. In these, we explain how everyone in the Group assumes responsibility for the quality of our services.

In addition to this factual aspect of quality management, there is a side to this, which is defined by the motivation and attitude of employees, which cannot be expressed in figures, facts and documents. At the end of the day, regarding the aspects of quality and reliability, the human side is just as indispensable as the formal part, as well as effective plant engineering, infrastructure and logistics. Not only

do we meet our customers' very high technological demands, but we also make a significant contribution towards product safety.

8.2 Stakeholders



As a company, we bear responsibility for the **people** we work with, the **environment** in which we work and the **social environment** that we shape.

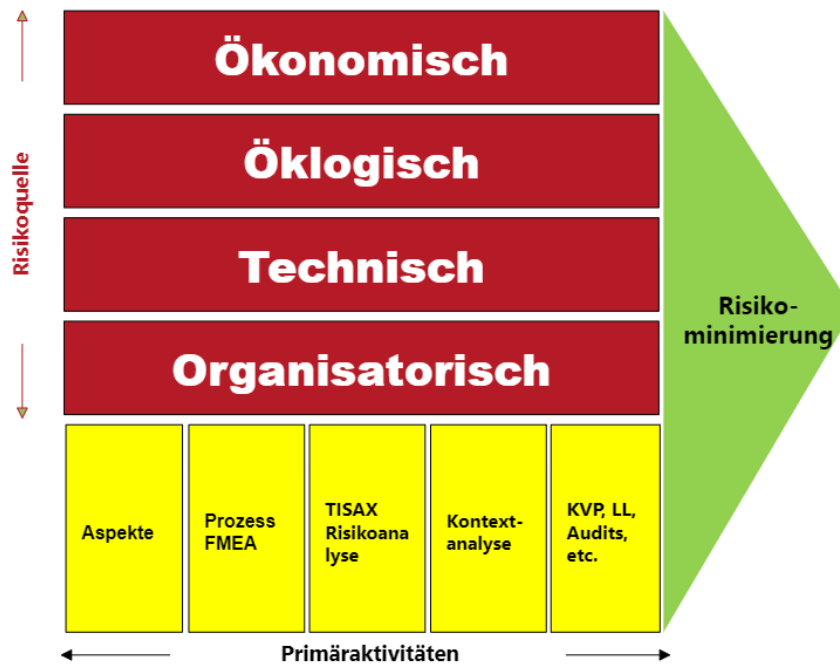
We have divided our stakeholders into four groups. The core group is the corporate group itself. The first external group (**direct**) consists of business partners who directly influence our business activities as well as our social and environmental impacts.

In the second group, we have identified our **partners** who support and assist the Hanomag Lohnhärterei Group in many ways – technologically, legally and preventively.

In the third group (**the public**), stakeholders are listed with whom we are connected either in individual cases or through social engagement.

With the stakeholders mentioned, there are binding obligations in the form of legal obligations, customer requirements or other requirements that an organisation must fulfil or voluntarily decides to fulfil.

8.3 Managing risks



To manage risks, we have implemented a regular assessment of risks and opportunities across all areas of the Group. In addition, in the QM area, we track existing and potential risks using the FMEA methodology. Our risk management includes viewing the aspects, assessing their materiality and defining corrective measures.

We conduct an SDG-based materiality analysis and assess whether a goal is related to Hanomag and to what extent we can influence it.

8.4 Information security and data protection

We attach great importance within the Hanomag Lohnhärterei Group to the security of personal data, intellectual property, know-how and sensitive technical or financial information.

To this end, we have established a series of guidelines and procedural instructions that comprehensively regulate data protection, the handling of confidential data and cyberattacks. As part of our TISAX label, we have developed emergency plans and expanded organisational and physical protective measures.

We have set up access authorisations to buildings and facilities, as well as to our IT systems, for all employees of the Group. Raising awareness of information security is part of our training activities.

Assessing our approach to information security is part of our risk management.



9 SDGs – Index

SDGs	Page(s)	SDGs	Page(s)
	7, 10, 11, 13		9, 10, 11, 12
	7, 10, 11, 13		15, 16
	9		14
	8		12, 13, 14, 15
	11, 12		4, 13
	4, 13		13, 14
	3, 4, 7, 12, 13		11, 15, 16
	5, 10, 11		15, 16
	11, 12		


















10 ESRS – Index and SDG / ESRS Matrix

ESRS	Page(s) in this issue
ESRS E1 Climate change	3, 4, 7, 12, 13, 14, 15
ESRS E2 Environmental pollution	15, 16
ESRS E3 Water and marine resources	4, 13
ESRS E4 Biodiversity and ecosystems	13, 14
ESRS E5 Circular economy	11, 12, 14, 15, 16
ESRS G1 Company policy	11, 15, 16
ESRS S1 Own workforce	7, 8, 9, 10, 11, 12, 13
ESRS S2 Value chain workforce	7, 8, 9, 10, 11, 12, 13
ESRS S3 Affected communities	4, 7, 8, 9, 10, 11, 12, 13, 15
ESRS S4 Consumers and end users	9, 15

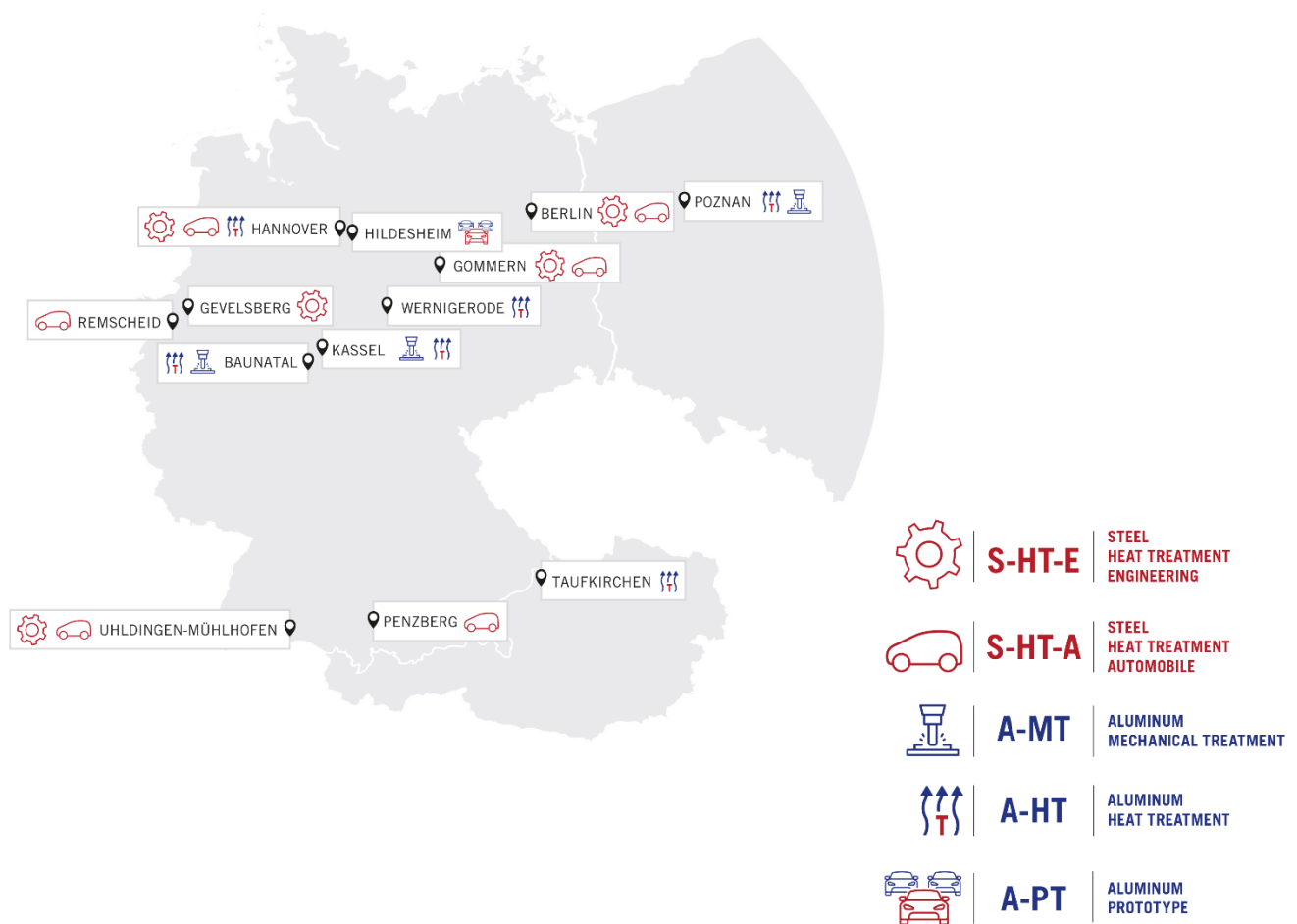
01 Management

Guidelines

Sustainability Compass

ESRS SDG	E1	E2	E3	E4	E5	G1	S1	S2	S3	S4
							X	X		
								X	X	
							X	X	X	X
							X		X	
							X	X	X	
			X						X	
	X				X					
							X	X	X	
					X					
							X	X	X	
		X			X					
					X					X
	X									
		X	X	X						
		X		X						
						X				
						X				

11 Locations



With 13 locations in the heart of Europe, the Hanomag Lohnhärterei Group is your partner for all matters relating to heat treatment and machining.

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