



# **Sustainability Report**

## **2024**

**TROPAG Oscar H. Ritter GmbH**

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Hamburg, 29 July 2025

## Foreword

Dear Readers,

In today's dynamic and interconnected world, sustainability is not a separate discipline—it is integral to how we operate, deliver value, and define success. At Tropag Oscar H. Ritter Nachf. GmbH, we proudly present this Sustainability Report 2024 as a reflection of our commitment to excellence, transparency, and responsible action along the entire value chain.

For more than 115 years, Tropag has thrived through integrity, reliability, and meaningful relationships—with our employees, our suppliers, and our customers. These principles guide our efforts to meet the demands of a changing world while safeguarding the values that define who we are.

In this report, you will find evidence of our progress: strengthened ESG performance, reduced Scope 1 and 2 emissions, full reliance on renewable electricity, and the expansion of supplier-specific carbon data collection in Scope 3. Our recent EcoVadis rating, AEO-F status, and ISO 9001 and GMP+ certifications reflect the quality systems we have embedded to support this mission.

We are especially proud of our GMP+ Feed Safety Assurance and our role in the international BeResponsible program, which promote downstream user safety, risk prevention, and regulatory transparency in sensitive sectors. These initiatives exemplify our belief that product stewardship and consumer protection are fundamental to sustainability.

We also recognize that business travel (Scope 3, Category 6) presents unique challenges—especially in a company where personal relationships and global presence are central to business success. To manage this, Tropag has implemented a residual CO<sub>2</sub> quota model, allowing us to maintain flexibility while staying on track toward our 2045 net-zero target.

As regulatory landscapes shift, we remain agile. While the German Supply Chain Act may be subject to revision and harmonization at the EU level, other frameworks such as the NIS2 Directive are introducing new layers of responsibility, particularly in cybersecurity and business continuity. Tropag takes these developments seriously and prepares proactively—often beyond what is legally required—to ensure resilience, compliance, and trustworthiness in all aspects of our business.

Our commitment is clear: we will continue to improve, learn, and lead. By combining tradition with innovation and ambition with responsibility, Tropag ensures that sustainability remains more than a goal—it is the standard by which we do business.

Sincerely,

**Prof. Dr. Andreas Köster**

Managing Director

TROPAG Oscar H. Ritter Nachf. GmbH

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# 1 Ownership structure and operational framework

GRI 2-1 | GRI 2-2 | GRI 2-3

Founded in 1909 by the visionary trader Oscar H. Ritter in London, TROPAG has stood as a beacon of international trading excellence for over a century. In 1919, the company was officially registered in Hamburg under the name “Tropische und überseeische Rohprodukten Aktiengesellschaft”.

Today, the historical cable address “TROPAG” continues to symbolize our legacy and remains the heart of our corporate identity, with TROPAG Oscar H. Ritter Nachf. GmbH having its legal and operating headquarters in Hamburg, Germany.

Since TROPAG Oscar H. Ritter Nachf. GmbH, as a non-capital-market-oriented, medium-sized company, is not subject to mandatory sustainability reporting under current legal requirements in Germany and the EU, and maintains a very lean governance structure (with no bodies such as a supervisory board or management board), certain GRI chapters (e.g., 2-10 to 2-14, 2-17 to 2-21) are not reported or are only partially reported where relevant. These disclosures are neither required nor appropriate for the specific corporate structure. Nevertheless, all material information is disclosed as far as possible within the given framework.

The reporting boundaries of this sustainability report include the TROPAG Oscar H. Ritter Nachf. GmbH and its 100% subsidiary, Tropag France SARL. Both companies are included in this annual report, which covers the reporting period from 01.01.2024 to 31.12.2024.

## 1.1 Business Model

GRI 2-6

For more than 100 years, TROPAG has placed unwavering emphasis on the human element. This commitment extends to all our business partners and employees, whom we regard as the cornerstone of our success. Guided by this principle, we continuously strive to uphold integrity, reliability, and collaboration, which are integral to ensuring sustained economic growth and a responsible future.

TROPAG specializes in sourcing and supplying rare and high-quality raw materials tailored to meet the unique demands of the global processing industries. Our expertise lies in:

- Special Metal Alloys: Supplying niche alloys that are vital for advanced industrial applications.
- High-Grade Chemical Products: Procuring primary and intermediate chemical products that meet the stringent requirements of our clients.

TROPAG plays a pivotal role as an intermediary and advisor between suppliers/producers and end users. Our operations significantly and sustainably contribute to the worldwide value chain. We offer both technical consultancy and supply chain solutions. Our role goes beyond trading—we provide expert guidance to ensure quality, sustainability, and innovation across every transaction.

By fostering collaboration, transparency, and innovation, TROPAG ensures that its services create lasting value for all stakeholders.

## 1.2 Targets and Ambitions

GRI 2-22 | GRI 2-23 | GRI 2-24

At TROPAG, customer and supplier satisfaction lies at the heart of everything we do. We continuously monitor market trends to offer optimal products and services that meet the evolving needs of all parties involved.

To achieve this, we:

- Regularly exchange information with both internal and external stakeholders to ensure alignment with sustainability objectives.
- Identify and address key sustainability topics, taking proactive measures to integrate them into our operations.

TROPAG is deeply committed to adhering to all applicable laws, regulations, and guidelines. In addition, we provide our employees with long-term development opportunities while recognizing our broader societal responsibilities.

Key principles include:

- Environmental Protection: Prioritizing eco-friendly practices in every decision.
- Health and Safety: Ensuring the well-being of our employees and those of our business partners.
- Social Standards: Upholding and promoting fair and ethical labor practices across the value chain.

To support these goals, we:

- Annually review and update our quality, safety, and environmental protection policies.
- Maintain Code of Conducts for customers and suppliers, clearly outlining our sustainability expectations and commitments both internally and externally.

TROPAG's long-standing focus on quality, compliance, and sustainability ensures that it remains a trusted partner in the global market. Through its robust systems and proactive measures, the company not only meets but often exceeds stakeholder expectations, setting a benchmark for responsible and forward-thinking business practices.

## 1.3 Sustainability Strategy

GRI 2-22 | GRI 2-23 | GRI 2-24 | GRI 2-27 | GRI 3-3

Global climate change is one of the greatest challenges humanity is facing today, requiring urgent and ambitious action. It is also critical to protect and regenerate our resources and life-support systems like forests, water and biodiversity, for present and future generations. At the same time, we are seeing global poverty and social inequality increase, which in turn jeopardizes human rights and the basis of social coexistence.

We acknowledge that companies like TROPAG play a role in meeting these challenges and bringing about transformational change. These are also the key expectations of our stakeholders: All have expressed an increasing interest in sustainability-oriented products and solutions. At the same time, they are calling for transparent and reliable information that enables them to understand and track sustainability contributions along the value chain.

As TROPAG does not operate any own production facilities and maintains only an office building in Hamburg, production-related sustainability topics are generally not material. Sustainability management and reporting focus instead on those aspects relevant to our office-based trading business model. In line with our tradition of excellence and adaptability, we approach the challenges of the 21st century and are committed to:

- Reducing the environmental impact of our operations.
- Fostering long-term partnerships with eco-conscious suppliers.
- Encouraging innovation in sustainable raw material sourcing and usage.

As the regulatory landscape for business sustainability reporting evolves, TROPAG acknowledges the significance of key frameworks such as the European Corporate Sustainability Reporting Directive (CSRD) and the German Supply Chain Due Diligence Act. These regulations emphasize the importance of transparency, environmental stewardship, and human rights due diligence within global value chains.

Although TROPAG, as a medium-sized company, is not formally obligated to comply directly with all of these regulations, many of our customers are subject to these requirements. This creates an indirect expectation for TROPAG to align with these standards to support our customers in meeting their compliance obligations.

Each year, we publish a comprehensive Sustainability Report as part of our Quality Management (QM) review. This report encapsulates our goals, performance indicators, measures, and responsibilities for ongoing improvement. The effectiveness of these measures is assessed during subsequent management reviews, ensuring accountability and progress.

### 1.3.1 Quality Management Systems

For over two decades, TROPAG's Quality Management System (QMS) has been certified by the international certification body LRQA (Lloyd's Register Quality Assurance) in accordance with ISO 9001 standards. The principles of our QMS create a cohesive and effective approach to managing our responsibilities.

- Risk Management: Identifying, assessing, and mitigating risks across all operational areas, ensuring compliance with both regulatory requirements and internal quality standards.
- Process Optimization: Streamlining workflows and eliminating inefficiencies to enhance reliability and reduce environmental impact, contributing to our sustainability goals.
- Employee Training and Awareness: Equipping our teams with the knowledge and skills necessary to uphold AEOF standards and foster a culture of quality and accountability.
- Continuous Improvement: Leveraging data-driven insights and feedback mechanisms to refine our processes, enhance security measures, and adapt to changing regulatory landscapes.

TROPAG is proud to hold the status of an Authorized Economic Operator Full (AEOF), a certification that underscores our unwavering commitment to compliance, security, and operational excellence. This esteemed designation is granted only to companies that meet the European Union's stringent requirements in customs compliance, financial solvency, and adherence to safety and security standards. As an AEOF-certified organization, TROPAG operates at the highest level of reliability and trust within the global supply chain.

Achieving and maintaining the AEOF status is not merely an accreditation; it reflects a deep integration of robust processes and controls across all facets of our operations. These mandatory obligations align seamlessly with our established quality management systems, which are integral to our day-to-day operations. At TROPAG, quality management is not only a system but also a culture, ensuring that we deliver value, reliability, and sustainability to our stakeholders.

The AEOF certification imposes a series of rigorous obligations that TROPAG diligently fulfills. These include:

- Customs Compliance: Adhering to all relevant customs legislation and regulations, with proactive measures to ensure accuracy and timeliness in customs declarations and procedures.
- Financial Solvency: Demonstrating a stable and reliable financial position, which guarantees the continuity of our operations and our ability to meet obligations to customers and partners.
- Safety and Security: Implementing advanced security protocols to protect our supply chain from potential threats, including unauthorized access, tampering, and illicit activities.
- Transparent Communication: Maintaining open and transparent communication with customs authorities and other regulatory bodies, fostering a climate of trust and collaboration.

These obligations are not standalone requirements but are deeply interconnected with our broader quality management objectives. They ensure that our processes are efficient, compliant, and continuously improving to meet evolving global standards.

Given TROPAG's status as a trading company without its own production or storage facilities, the certification of environmental, energy, or occupational safety management systems is not directly relevant. However, TROPAG integrates key requirements related to these areas into its existing Quality Management System. Improvement opportunities in these fields are modest but are actively pursued within the framework of the QMS. This approach ensures that sustainability considerations are woven into the company's operations, aligning with its broader commitment to responsible business practices.

In addition to our ISO 9001 and AEOF certification, TROPAG operates under the GMP+ Feed Safety Assurance Module 2020, further emphasizing our commitment to quality and safety. The GMP+ (Good Manufacturing Practices) certification is specifically designed to ensure the safe and responsible supply of feed additives, adhering to stringent safety and quality standards that protect both animal and human health.

This certification establishes a comprehensive framework for monitoring and managing risks associated with the production, transportation, and distribution of feed additives.

Key aspects of the GMP+ Feed Safety Assurance Module 2020 include:

- Risk-Based Approach: Implementing rigorous hazard analysis and risk assessment protocols to identify and mitigate potential contaminants in the feed supply chain.
- Traceability: Ensuring full transparency and traceability of raw materials and finished products throughout the supply chain, enabling rapid response to any safety concerns.
- Compliance with Legal Standards: Aligning our practices with national and international regulations, fostering trust among regulatory authorities and stakeholders.
- Continuous Training: Empowering our employees with ongoing education and training to uphold GMP+ standards and promote a culture of safety.

The GMP+ certification not only reinforces the safety of our feed additives but also safeguards the health of consumers by ensuring the integrity of the food supply chain. By adhering to this certification, TROPAG actively contributes to the prevention of contamination and the assurance of quality, fostering confidence among our customers and end-users. This focus on safety and reliability strengthens our reputation as a trusted partner in the feed and food industries.

### 1.3.2 Compliance Management System (CMS)

In 2019, TROPAG established a Compliance Management System (CMS) to demonstrate its adherence to all applicable laws, regulations, and directives. This system has since been maintained and enhanced to reflect the company's proactive approach to legal and regulatory compliance. The CMS serves as a cornerstone for embedding accountability and integrity into TROPAG's business practices, ensuring transparency and trust across its operations.

### 1.3.3 Recognition of Corporate Social Responsibility (CSR)

TROPAG's efforts to embed Corporate Social Responsibility (CSR) principles into its operations have been recognized on an international level. Since 2016, TROPAG has been regularly audited by EcoVadis, a globally recognized platform for sustainability ratings. In December 2023, TROPAG achieved a score of 64 points, placing us in the 82nd percentile and earning the Silver Medal.

Building upon this achievement, TROPAG proudly joined the United Nations Global Compact in 2024. This significant step demonstrates our commitment to aligning our business practices with ten universally accepted principles in the areas of human rights, labor, environment, and anti-corruption. The UN Global Compact is the world's largest corporate sustainability initiative, bringing together thousands of companies and organizations globally to drive sustainable progress and responsible business practices.

By joining the UN Global Compact, TROPAG reaffirms its dedication to:

- **Human Rights:** Promoting and respecting human rights in all aspects of our operations and across our supply chain.
- **Labor Standards:** Upholding fair labor practices, ensuring decent working conditions, and prohibiting child or forced labor.
- **Environmental Stewardship:** Reducing our environmental impact through sustainable resource use, waste reduction, and the adoption of eco-friendly technologies.
- **Anti-Corruption:** Combating corruption in all its forms, including extortion and bribery, through transparent and ethical business practices.

Our participation in the UN Global Compact strengthens our existing CSR initiatives and aligns with our vision of creating long-term value for society, the environment, and our stakeholders. By adhering to these principles, we aim to contribute to a fairer, greener, and more inclusive global economy.

### 1.3.4 Continuous Improvement of CSR Standards

The management, in collaboration with employees, has established clear goals and measures aimed at the continuous and sustainable improvement of our environmental, social, and compliance standards.

Key aspects of this initiative include:

- **Proactive Monitoring:** The implementation of these goals and measures is continuously monitored to ensure alignment with our sustainability objectives.
- **Immediate Action on Deviations:** In the event of any deviation, corrective actions are promptly initiated to address and resolve issues effectively.
- **Commitment to Progress:** This ongoing process reflects our dedication to achieving higher standards of Corporate Social Responsibility (CSR) across all aspects of our operations.

## 2 Environment

### 2.1 General Reporting

GRI 2-22 | GRI 2-23 | GRI 3-3

At TROPAG, our annual Environmental Protection and Occupational Safety Program outlines goals and measures that empower all employees to contribute to environmental and climate protection. While the opportunities to significantly influence environmental sustainability in a pure office setting are limited, we actively implement measures to reduce resource consumption. Key initiatives include: minimizing printing, reducing water usage, lowering electricity and heating energy consumption, and improving building energy efficiency through renovations.

This overview highlights our commitment to sustainability and sets the stage for deeper insights into our targeted environmental initiatives and performance metrics in the following chapters.

### 2.2 Energy Consumption and CO<sub>2</sub> Emissions

GRI 302-1

This report outlines the energy consumption and associated emissions of TROPAG Oscar H. Ritter Nachf. GmbH for the year 2024. The analysis is categorized into Scope 1, Scope 2 and Scope 3 (Category 6) emissions in accordance with the Greenhouse Gas (GHG) Protocol standards. Additionally, emission intensity metrics are included to provide context on how emissions relate to key performance indicators. The total energy consumption of fuels, electricity and heat totaled 132,271kWh kWh in 2024<sup>1</sup>.

#### 2.2.1 Scope 1

GRI 305-1 | GRI 305-4

Scope 1 emissions cover direct greenhouse gas emissions resulting from activities within TROPAG’s operational control. In 2024, the primary contributor to Scope 1 emissions was the company’s vehicle fleet. In order to reduce CO<sub>2</sub> emissions in the future, TROPAG is also increasingly focusing on e-mobility. One of the plans is therefore to add an electric car to the fleet.

Two wall boxes, which enable the charging of electric cars, were installed on the TROPAG site at the beginning of 2023.

The TROPAG fleet emitted 7 metric tons of CO<sub>2</sub>. These emissions stem from the combustion of fossil fuels in company-owned vehicles. Reducing fleet emissions remains a priority, and TROPAG is exploring the adoption of electric or hybrid vehicles to align with its carbon-neutral ambitions.

The intensity factor for Scope 1 emissions was calculated at 0.91, compared to 1.01 in 2023, indicating how these emissions compare to TROPAG’s number of staff and working days in the particular year. This metric underscores the importance of decoupling carbon emissions from business growth through more sustainable operations.

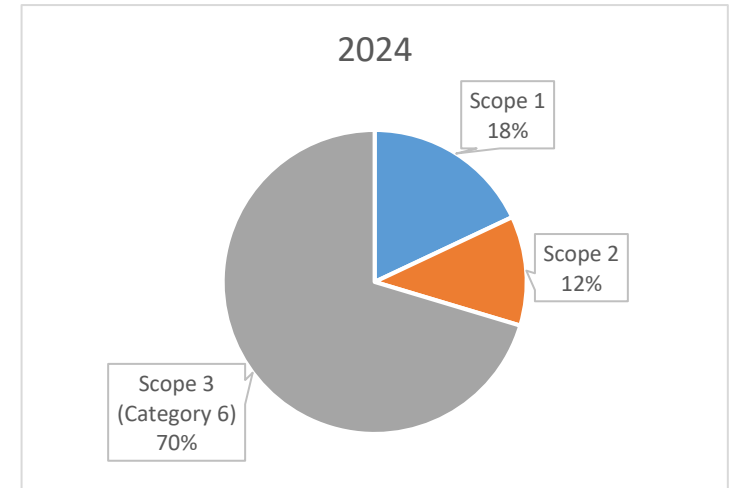


Figure 1: Summary of 2024 Emissions

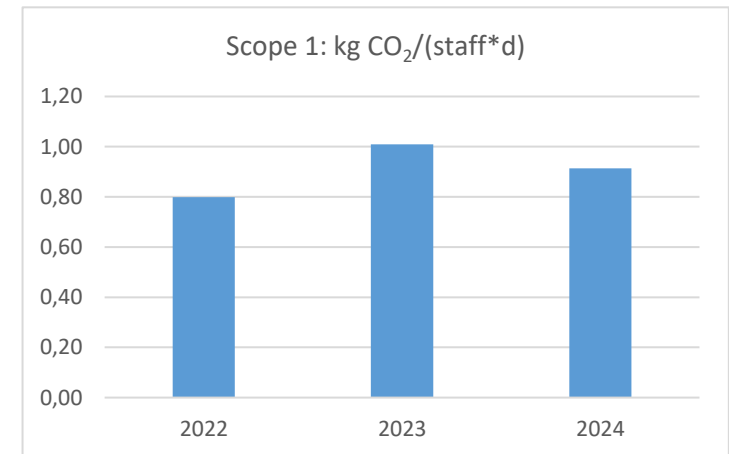


Figure 2: Scope 1 Emission Intensity

<sup>1</sup> Fuel before combustion, covering Scope 1 and purchased fuels within Scope 3.6, and Scope 2 (electric energy and district heating).

### 2.2.2 Scope 2

GRI 305-2 | GRI 305-4

Scope 2 emissions encompass indirect greenhouse gas emissions from purchased electricity and heating. TROPAG has taken deliberate steps to minimize these emissions by sourcing energy from renewable and low-carbon providers.

#### 2.2.2.1 Electricity Consumption

In 2024, TROPAG consumed 27,776 kWh of electricity, a decrease from 28,687 kWh in 2023. This electricity was supplied by Vattenfall under the Nature tariff, which guarantees 100% renewable energy.

We calculate our performance indicator for electricity consumption based on the number of employees and working days of the relevant year. Compared to the previous reporting period, we were able to reduce electricity consumption by a further 13%.

TROPAG's electricity consumption resulted in 0 kg of CO<sub>2</sub> emissions due to its exclusive reliance on renewable energy sources. The renewable electricity was sourced from renewable sources, with 29.4% originating from Sweden and 60.7% from Norway. This energy mix ensures a reliable and environmentally friendly supply.

Vattenfall, known for its leadership in sustainability, was awarded the Ecovadis Platinum certification in 2024, placing the company in the top 1% of the energy industry for environmental performance. This recognition underscores Vattenfall's exceptional commitment to enabling fossil-free living within one generation. By partnering with Vattenfall, TROPAG actively supports a zero-emission energy system.

#### 2.2.2.2 Heating Consumption

TROPAG utilized 72,229 kWh of district heating in 2024, a reduction from 78,678 kWh in 2023. The district heating was supplied by Hamburg Energiewerke, an industry leader in sustainable heating solutions.

District heating is recognized as one of the most environmentally friendly and efficient heating methods available, given its low impact on natural resources. However, the CO<sub>2</sub> emissions for district heating are calculated at 0.064 kg CO<sub>2</sub> per kWh. Based on TROPAG's consumption of 72,229 kWh, the total emissions for district heating in 2024 amounted to 4.62 metric tons of CO<sub>2</sub>.

We calculate our performance indicator for heating energy consumption based on the adjusted CO<sub>2</sub> emissions per m<sup>2</sup> and Heating Degree Day (HDD).

The heating degree days (HDD) metric reflects the heating demand required based on external temperatures. In 2024, the HDD for Hamburg was 3,004, compared to 3,148 in 2023. This represents a 4,5% reduction in heating demand due to milder weather conditions.

When adjusted for the decrease in HDD, TROPAG's 2024 heating consumption aligns closely (i.e. -4%) with its temperature-adjusted value for 2023. This demonstrates consistent energy efficiency in heating performance, despite external temperature variations.

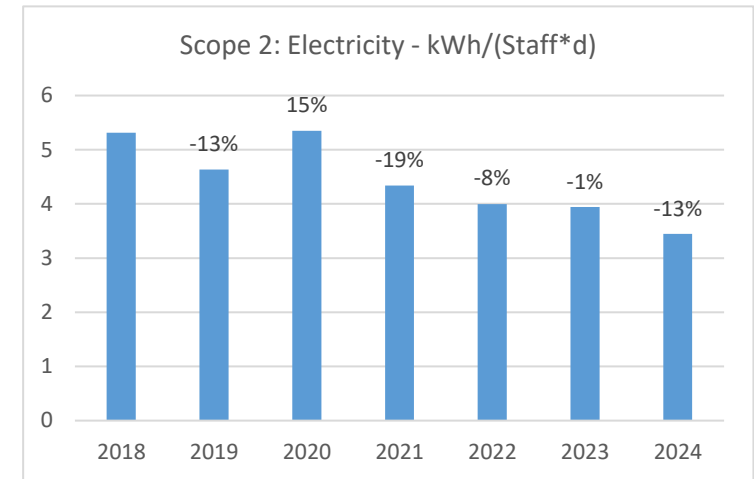


Figure 3: Evolution of consumption intensity for electricity since 2018

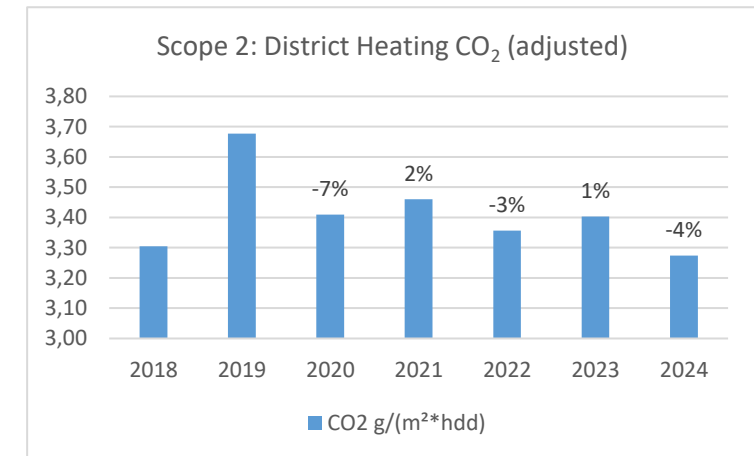


Figure 4: Evolution of emission intensity for district heating since 2018

### Primary Energy Factor and Efficiency

The actual emission factor is at 64 g/kWh, with a Primary Energy Factor (PEF) for district heating in Hamburg of 0.33, reflecting a highly resource-efficient energy supply.<sup>2</sup> This low PEF highlights the city's ongoing efforts to expand renewable energy use in heat generation.

### Hamburg's Transition to Renewable Heating

The district heating energy mix currently includes 20.2% renewable sources, with plans to eliminate coal-based heating sources entirely by 2030. As stated by Hamburger Energiewerke:

*"This is made possible because we are consistently increasing the share of renewable energy in heat generation. By 2030, we will completely phase out coal-based heat."*

The city has committed to achieving full climate neutrality in accordance with the Hamburg Climate Protection Act. This includes a systematic transformation of the district heating portfolio, replacing fossil fuels with renewable energy sources and waste heat recovery.

Starting in 2026, our district heating supplier will implement Germany's largest wastewater heat pump at the Dradenau wastewater treatment plant. This new 60-megawatt installation, developed by Hamburg Wasser and Hamburger Energiewerke, will use renewable energy extracted from treated wastewater to provide climate-friendly heat for up to 39,000 households. The system is expected to reduce district heating-related CO<sub>2</sub> emissions by up to 90,000 tons per year.<sup>3</sup>

As a consumer of district heating in Hamburg, TROPAG welcomes this innovation. Once operational, this initiative will further reduce the carbon footprint associated with our heating energy, supporting our ongoing commitment to decarbonization and alignment with regional and global climate targets.

We fully support and align with this transition, as it directly contributes to the decarbonization of our Scope 1 emissions. By continuing to use district heating in Hamburg, we benefit from a continuously decreasing carbon footprint – with the long-term goal of net-zero heat supply by 2040, i.e. 2045 at the latest.

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<sup>2</sup> <https://waerme.hamburger-energiwerke.de/heizen-mit-fernwaerme/nachhaltigkeit-primaerenergiefaktor> (dated April, 23<sup>rd</sup> 2025)

<sup>3</sup> <https://hamburg-business.com/de/news/so-will-hamburg-fernwaerme-aus-abwasser-gewinnen>

### 2.2.3 Scope 3 Emissions and Reporting

GRI 305-3 | GRI 305-4

**Scope 3 emissions** encompass all indirect greenhouse gas (GHG) emissions that occur in a company's value chain, excluding emissions from energy purchased and used directly (Scope 2). Scope 3 is divided into **15 categories** spanning upstream and downstream activities, offering a comprehensive view of a company's broader environmental impact.

#### Key Categories of Scope 3 Emissions

##### 1. Upstream Emissions:

- Purchased Goods and Services (Category 1)
- Capital Goods (Category 2)
- Fuel- and Energy-Related Activities Not Included in Scope 1 or 2 (Category 3)
- Upstream Transportation and Distribution (Category 4)
- Waste Generated in Operations (Category 5)
- Business Travel (Category 6)
- Employee Commuting (Category 7)
- Upstream Leased Assets (Category 8)

##### 2. Downstream Emissions:

- Downstream Transportation and Distribution (Category 9)
- Processing of Sold Products (Category 10)
- Use of Sold Products (Category 11)
- End-of-Life Treatment of Sold Products (Category 12)
- Downstream Leased Assets (Category 13)
- Franchises (Category 14)
- Investments (Category 15)

For trading companies like TROPAG, which do not engage in manufacturing, many Scope 3 emission categories are not applicable due to the nature of the business model.

At present, TROPAG exclusively reports on Category 6: Business Travel, capturing the emissions generated by employee travel for work-related purposes. This includes air travel, car rentals, and other modes of transport, providing a focused but vital perspective on the company's indirect emissions.

For all other categories, we give short explanations why those may not be (yet) possible or not relevant for our Scope 3 reporting.

### 2.2.3.1 *Category 1: Purchased Goods and Services*

As a distributor of niche and specialty chemical products, we source a wide range of complex substances from a diverse array of upstream suppliers. These substances often have highly specific compositions or synthesis pathways not adequately represented by common lifecycle databases or standard secondary emission factors.

Due to this specificity, standard secondary emission factors are frequently unavailable or not representative of our actual purchased goods. Consequently, our primary focus is on obtaining supplier-specific Product Carbon Footprints (PCFs), wherever possible, as these primary data sources provide the most precise and credible estimates of emissions associated with our purchased products.

However, we recognize that not all suppliers currently offer PCFs; thus, emissions related to some purchased goods cannot yet be reliably estimated. We explicitly acknowledge this existing data gap and continue working diligently to close it through increased supplier engagement, collaboration, and advocating for greater industry-wide transparency.

To enhance data collection, transparency, and sharing of upstream PCFs, we have recently adopted the SiGreen platform. SiGreen has been developed by Siemens in collaboration with the Together for Sustainability (TfS) initiative, backed by leading companies in the European chemical industry. Using SiGreen, we have begun sharing our available PCFs directly with customers, and we will continue to expand our available footprint data as more reliable information is received. Customers may benefit from this enhanced transparency by registering on the platform and freely accessing our available PCF data on demand, underscoring our commitment to providing excellent and accessible customer-focused service.

Furthermore, certain TROPAG products will fall under the European Union Carbon Border Adjustment Mechanism (CBAM), and emissions associated with these specific products will be tracked and reported accordingly, in compliance with applicable regulatory guidelines.

While we clearly recognize that emissions from Purchased Goods and Services represent a significant and material share of our overall Scope 3 footprint, our approach remains conservative. We only include emissions data for purchased products when credible PCFs exist, thereby ensuring transparency, credibility, and reliability in our sustainability reporting. At the same time, we stress the importance of closing existing data gaps, and we remain committed to progressively enhancing data coverage, accuracy, and supplier collaboration, aligned with evolving best practices and industry developments.

### 2.2.3.2 *Category 2: Capital Goods*

Applicable only if significant investments in equipment or infrastructure are made, which is not the case for TROPAG

### 2.2.3.3 *Category 3: Fuel- and Energy-Related Activities*

Our direct fuel consumption is limited to vehicles operated within our own fleet, including diesel and gasoline, which are accounted for under Scope 1 emissions. For fuels consumed in rental vehicles used on our behalf, emissions are included under Scope 3, Category 6 (Fuel- and Energy-Related Activities for Leased Assets).

Purchased energy, such as renewable electricity and district heating, is accounted for in Scope 2. The upstream emissions associated with these energy sources are thus included in Scope 2 and are not double-counted in Scope 3.

### 2.2.3.4 *Category 4: Upstream Transportation and Distribution*

This category includes emissions associated with the transportation of goods from our suppliers to TROPAG's facilities or, in some cases, directly to our customers. As a distributor and trader, upstream logistics play a relevant role in our Scope 3 emissions profile.

In line with our commitment to environmental responsibility, TROPAG prioritizes low-emission transport modes wherever possible. Our preferred transport hierarchy—developed in close coordination with our customers—is as follows: ship > rail > truck > airplane. This approach is aimed at minimizing the carbon footprint of inbound logistics. Furthermore, we actively work to consolidate shipments, for example by maximizing container loads, in order to reduce transport frequency and improve efficiency.

Despite these efforts, detailed data on energy consumption and transport-related CO<sub>2</sub> emissions from upstream logistics is not yet comprehensively available. Many of our logistics partners currently do not provide shipment-specific emissions data, which limits our ability to quantify and report on this category accurately at this time.

We are committed to improving transparency and data availability in collaboration with our logistics providers. As more robust and consistent data becomes accessible, we will incorporate this information into our future Scope 3 reporting.

#### 2.2.3.5 *Category 5: Waste Generated in Operations*

GRI 3-3 | GRI 306-1 | GRI 306-2 | GRI 306-3 | GRI 306-4 | GRI 306-5

Germany boasts a highly regulated waste management system, emphasizing not only waste prevention but also the separation and recycling of materials. This comprehensive approach has positioned Germany as a global leader in sustainable waste practices.

In office settings, where waste generation is relatively minimal, there is little room for further optimization. Nevertheless, we remain committed to fostering awareness among employees and ensuring strict adherence to established recycling protocols. By doing so, we align with Germany's forward-thinking waste management principles and contribute to a more sustainable future. The volumes of waste generated were carefully monitored and maintained at levels that are not significant, both in total quantity and in terms of individual waste streams. The waste volumes remained consistently below the maximum thresholds specified and demonstrate the organization's commitment to minimizing environmental impact.

In Hamburg, residual waste is collected by the municipal waste management services and is either recycled or thermally recovered. According to the city's waste authorities, environmentally sound waste management is based on the hierarchy of "avoid, recover, dispose." By consistently separating waste streams, recyclable materials can be effectively recovered, while non-recyclable fractions are appropriately disposed of.

Organic waste is processed at the Biogas and Composting Plant in Bützberg, which produces up to 350 cubic meters of biomethane per hour from Hamburg's bio-waste and subsequently generates high-quality compost. This process highlights the value of proper separation at source and the role of the circular economy in urban waste practices.

Non-recyclable residual waste is thermally treated in local refuse-derived fuel plants, such as the Borsigstraße (MVB) and Rugenberger Damm (MVR) facilities. Here, energy is recovered in the form of district heating and electricity, and valuable byproducts like slag, gypsum, and hydrochloric acid are extracted for further use.

Overall, waste prevention remains the highest priority in Hamburg's waste management strategy. Consumers are encouraged to exchange, donate, or repair goods instead of discarding them, thereby conserving resources, reducing transportation needs, and minimizing environmental impact. TROPAG fully supports these principles by fostering responsible resource use and strict compliance with local waste separation and recycling protocols.

Less than 24m<sup>3</sup> of general waste was disposed of during the reporting period. This volume corresponds to a disposal schedule of 240 liters twice per week. The total amount highlights that general waste generation is limited and well-controlled.

#### **Bio-Waste Disposal**

The volume of bio-waste disposed of for recycling was less than 6m<sup>3</sup> during the reporting period, reflecting a collection frequency of 240 liters twice per month. This figure underscores the efficient management of organic waste streams and supports sustainable recycling practices.

#### **Packaging Waste (Plastic and Metal) Disposal**

Less than 6m<sup>3</sup> of packaging waste, including plastic and metal, was sent for recycling. This volume aligns with a collection schedule of 240 liters twice per month and further demonstrates a focus on waste segregation and recycling.

## Paper Waste Disposal

Paper waste generation was limited to less than 7m<sup>3</sup> during the reporting period. This volume corresponds to a disposal frequency of one 660-liter container per month. The low volume of paper waste underscores the organization's efforts to optimize resource use and promote recycling.

Paper waste, once considered mere refuse, is now regarded as a valuable resource, playing a significant role in the circular economy. Similarly, packaging waste is collected by producers and distributors and systematically directed into recycling processes. These measures ensure that materials are efficiently reused, reducing environmental impact and conserving resources.

## Printing Reduction Efforts

TROPAG is committed to reducing paper consumption as part of our ongoing sustainability efforts. The trend towards decreased printing continues to gain momentum, driven by advancing digitalization across the organization.

To monitor and improve our environmental performance, we track the number of printouts relative to the number of transactions. This ratio provides an adjusted indicator that reflects printing intensity in relation to economic activity.

Following a temporary increase in 2020, printouts per transaction saw a significant reduction of 36% in 2021. This marked a turning point, driven by targeted digitization efforts. Since then, the figure has continued to decline steadily: by 2% in 2022, 7% in 2023, and another 7% in 2024.

These reductions underscore the success of our ongoing digital transformation, which continues to contribute to lower paper consumption and supports our broader sustainability goals.

In other areas, such as general administration, accounting and consulting, the generally positive trend was interrupted due to coronavirus and working from home. The number of printouts per employee in this area rose by 37% in 2021 compared to the previous year. This figure was reduced again by 7% in 2022. Extensive digitalization measures are being implemented, which will have a positive impact in the coming years. Due to the shared use of printers across multiple entities—including activities related to real estate management and the company's foundation—comprehensive and accurate data collection on the number of printouts per employee in the Administration and Accounting departments could not be maintained consistently. As a result, some data for these departments may be incomplete or not fully representative of TROPAG's actual printout volumes.

Looking ahead, TROPAG is implementing extensive digitalization measures designed to minimize reliance on paper. These initiatives are expected to further reduce print volumes and strengthen our commitment to sustainable practices in the coming years.

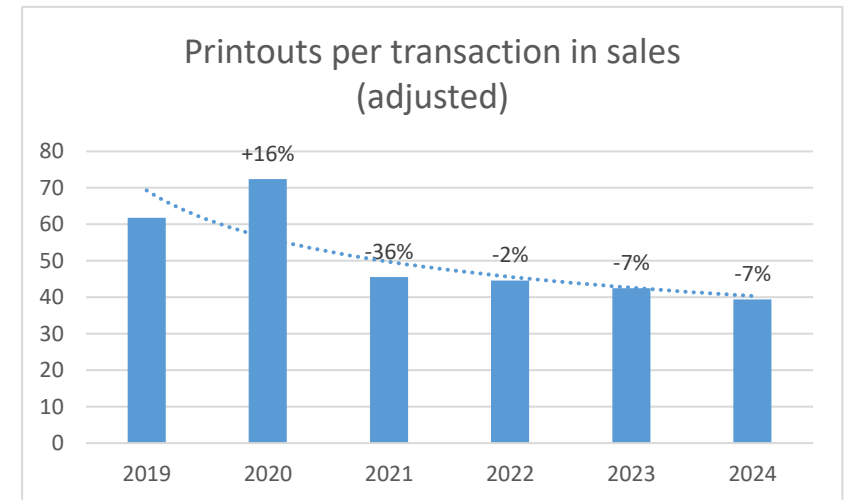


Figure 5: Evolution of printouts 2019-2024 in Sales

### 2.2.3.6 Category 6: Business Travel

Business travel remains a critical success factor in our operations—particularly for sales, client relationships, and international coordination. At the same time, it represents a significant portion of our Scope 3 emissions under Category 6. As part of our commitment to reach net-zero GHG emissions by 2045, we are implementing a target-oriented, data-driven emissions framework for managing these emissions with increased granularity and operational relevance.

The year 2019 marks the baseline with 74 tonnes CO<sub>2</sub>e from business travel. A linear reduction pathway toward 2045 has been defined, implying a decrease of ~2.86 tCO<sub>2</sub>e per year. However, this model has been refined to better reflect business realities and allow strategic flexibility.

To ensure flexibility without compromising long-term climate goals, we have transitioned to a residual CO<sub>2</sub>e quota model. Instead of targeting strict annual caps, the company manages a declining emissions allowance (the “residual quota”) that reflects the remaining permissible CO<sub>2</sub>e under our 2045 net-zero trajectory.

Each year, the actual CO<sub>2</sub>e emissions from business travel are subtracted from the residual quota, which is updated accordingly.

As of 2025:

- Total residual quota (2023–2045): 713 tonnes CO<sub>2</sub>e
- Remaining CO<sub>2</sub>e quota (2025 projection): 648 tonnes
- This reflects real usage in 2023 (11 tCO<sub>2</sub>e) and 2024 (28 tCO<sub>2</sub>e), and enables buffer building if performance continues to exceed targets.

Beginning with the 2023 reporting cycle, we have adopted a KPI-based emissions tracking approach based on: CO<sub>2</sub>e emissions per employee per working day

This intensity metric allows us to normalize business travel emissions against operational scale, providing a more accurate reflection of efficiency improvements, growth, or contraction. For reference:

- 2019 intensity: 11.39 kg CO<sub>2</sub>e/employee-day
- 2023 intensity: 1.50 kg CO<sub>2</sub>e/employee-day
- 2024 intensity: 3.57 kg CO<sub>2</sub>e/employee-day

These values show a marked improvement, reflecting increased use of digital collaboration and optimized travel behavior.

This integrated model enables the company to respond dynamically to business needs (e.g., increased travel during sales peaks), while maintaining a long-term constraint that encourages year-on-year efficiency and responsible planning.

The accompanying chart visualizes both the Scope 3.6 intensity path and the residual CO<sub>2</sub>e quota trajectory:

1. Blue columns represent actual emissions intensity (kg CO<sub>2</sub>e per employee per day).
2. Orange shaded area: the projected intensity target based on the original 2019–2045 pathway.
3. Light blue gradient: the residual CO<sub>2</sub>e quota, starting at 713 tCO<sub>2</sub>e in 2023 (i.e. 912 tCO<sub>2</sub>e in 2019) and reducing linearly to zero in 2045.
4. Labels highlight key years (e.g. 2023, 2024, 2025) with both measured and targeted values.

The residual quota approach provides strategic flexibility, allowing departments and teams to:

- Plan travel based on need and seasonality,
- Accumulate buffer capacity during low-travel years,
- Make data-backed decisions on high-value travel investments.

This prevents rigid limits that may hinder critical operations while upholding accountability for long-term carbon goals.

Outlook and Next Steps:

- Annual update of residual CO<sub>2</sub>e quota and intensity metrics
- Training and communication to embed carbon-conscious travel planning
- Exploration of carbon offsetting only after internal abatement is maximized

### 2.2.3.7 Category 7: Employee Commuting

Emissions from employees commuting to and from work, though this may be relatively minor compared to other categories.

In the year 2023, 46.6% of TROPAG's employees traveled to and from work with the Deutschland-Ticket.  
6.66% of TROPAG's employees traveled to and from work with an electric car

### 2.2.3.8 Category 8: Upstream Leased Assets

Only applies if the company leases significant operational assets, which is not the case at TROPAG.

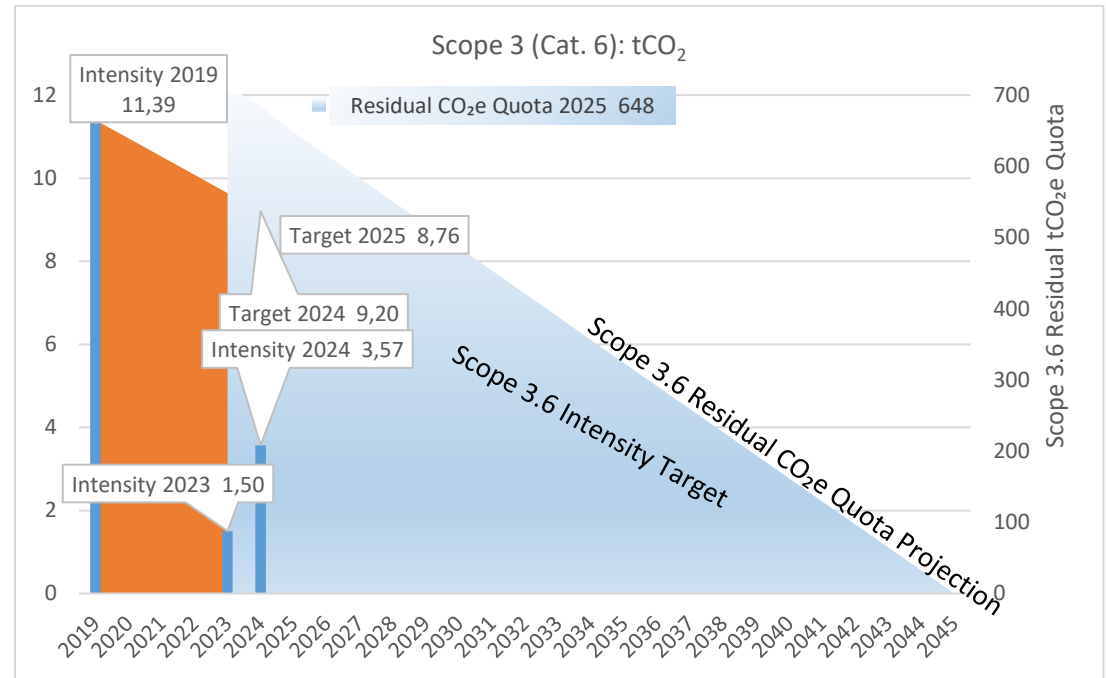


Figure 6: Scope 3 Category 6 Residual Quota Plan

### 2.2.3.9 *Category 9: Downstream Transportation and Distribution*

TROPAG's operations include the organization of transport and distribution of goods from manufacturers to customers, with some shipments routed through external warehouses. This makes Scope 3, Category 9 a relevant source of emissions for our business.

While we are working with a range of logistics providers, only one of our forwarders has recently begun supplying shipment-specific CO<sub>2</sub> emissions data. However, the available information is currently limited in scope and consistency, and does not yet provide a comprehensive or reliable basis for full reporting in this category.

We are actively engaging with our logistics partners to encourage more transparent and standardized emissions reporting. Improving data quality and coverage will enable us to build a more accurate and complete emissions profile for downstream transportation in future reporting cycles.

### 2.2.3.10 *Category 10: Processing of Sold Products*

Our organization supplies chemical products primarily as intermediates to industrial customers. These products are typically processed further—through chemical reactions, blending, or formulation—before becoming part of downstream products.

Due to the proprietary nature of our customers' formulations and manufacturing processes, we do not have access to detailed information regarding the specific processing methods applied. As such, a precise quantification of emissions associated with the downstream processing of our sold products is not feasible.

However, based on the general characteristics of our product portfolio and industry practices, we assume that emissions from processing activities may occur, but are not considered significant relative to other categories in our Scope 3 inventory. Furthermore, the responsibility for these emissions lies primarily with the processors and manufacturers that carry out the transformation steps.

In accordance with the GHG Protocol and GRI's materiality principle, and given the limited data availability and low relative impact, we currently consider Category 10 emissions to be not material for reporting purposes. We continue to monitor developments and will reassess this position if product-specific data or industry benchmarks become available.

### 2.2.3.11 *Category 11: Use of Sold Products*

As a B2B chemical distributor, we primarily supply intermediate products such as base chemicals, reagents, and additives to industrial customers. These products are not directly used in final applications but are instead further processed by our clients into downstream products.

We have no direct influence over, or detailed insight into, the specific end uses of the materials we sell. In line with the GHG Protocol, emissions from the use phase of final products are attributed to the company placing those final products on the market, not to upstream suppliers of intermediates.

Therefore, Scope 3, Category 11 is considered not material to our operations. The use-phase emissions associated with our sold products are not attributable to us, as they occur outside our sphere of control and responsibility, in the context of further downstream transformation and use.

This assessment is consistent with the GRI principle of materiality, which requires that sustainability disclosures reflect the organization's most significant impacts. Based on the nature of our product portfolio and business model, use-phase emissions (Category 11) do not represent a material impact for reporting purposes.

#### 2.2.3.12 *Category 12: End-of-Life Treatment of Sold Products*

As a B2B chemical distributor, we sell industrial chemical products that are primarily used as intermediates in further processing steps by our customers. Due to the nature of our business, we do not have detailed insight into the specific formulations, processing methods, or end-use applications of our products, as these are typically considered proprietary information by our clients.

Based on our understanding of the typical uses of our product portfolio, the majority of substances sold are:

- chemically transformed or consumed during industrial processing,
- not present as intact materials in final consumer or industrial products, or
- incorporated into products whose end-of-life treatment does not result in significant GHG emissions.

Given the limited availability of end-use data and the expected transformation or dissipation of our products before they reach final disposal stages, we consider Scope 3, Category 12 emissions to be immaterial in the context of our value chain emissions.

This conclusion is consistent with the GHG Protocol guidance and the GRI principle of materiality, as the potential end-of-life emissions of our sold products do not constitute a significant environmental impact attributable to our operations.

#### 2.2.3.13 *Category 13: Downstream Leased Assets*

TROPAG does not lease assets to third parties, making this category irrelevant.

#### 2.2.3.14 *Category 14: Franchises*

As TROPAG operates independently and does not engage in franchise agreements, this category does not pertain to its operations.

#### 2.2.3.15 *Category 15: Investments*

TROPAG does not engage in investments, this category does not pertain to its operations.

## 2.3 Water and Wastewater

GRI 303-1 | GRI 303-3 | GRI 303-4 | GRI 303-5

TROPAG's water use is limited to standard office-related needs, including hygiene and drinking water for employees and visitors. No water is used in production or industrial processes. The company is supplied with potable water through the municipal water network, and all wastewater is discharged into the public sewage system, also managed by the municipal utility provider. There is no direct water withdrawal from natural sources, nor is any water reused or recycled on-site.

Water consumption is continuously monitored through regular utility billing, ensuring transparency and enabling year-over-year comparison. In the year 2024, TROPAG consumed 176 m<sup>3</sup> of water, compared to 157 m<sup>3</sup> in 2023, 147 m<sup>3</sup> in 2022 and 161 m<sup>3</sup> in 2021. This demonstrates a stable consumption trend, with minor fluctuations primarily attributed to variations in office occupancy and the number of employees present during the year.

In TROPAG's office environment, all potable water supplied by the municipal utility is used exclusively for hygiene and drinking purposes. As there are no production activities or technical processes involving water on-site, nearly all water withdrawn is ultimately discharged as wastewater into the public sewage system, which is also managed by the municipal utility provider.

This means that in our specific operational context, the volume of wastewater discharged is essentially equivalent to the volume of water withdrawn from the municipal supply, with any differences attributable only to minor losses such as evaporation or residual water in sanitary facilities. No water is abstracted directly from natural sources, and no water is reused or recycled on-site.

TROPAG is committed to the responsible use of water resources, even in low-intensity settings such as office operations. Although water consumption is not a material environmental aspect for the company due to its low absolute volume, we continue to promote awareness among staff and maintain efficient water use practices throughout our facilities.

## 3 Ethics

### 3.1 The Role of the OSCAR AND VERA RITTER FOUNDATION

GRI 2-23 | GRI 2-24

Philanthropy has a remarkable tradition in Hamburg, reflecting the city's long-standing commitment to civic responsibility and social progress. The OSCAR UND VERA RITTER-STIFTUNG (Oscar and Vera Ritter Foundation), closely connected to TROPAG as a principal shareholder both institutionally and through shared leadership, exemplifies this tradition. Its mission to nurture musical talent is a direct outcome of TROPAG's economic efficiency and serves as a vital element of our sustainability policy.

Germany's non-profit foundations play a pivotal role in advancing societal well-being. They are essential contributors to cultural, scientific, and social development, enabling initiatives that often transcend public funding capacities. Foundations not only preserve Germany's cultural heritage but also foster innovation and inclusivity in diverse fields.

Hamburg, as the "Capital of Foundations" in Germany, leads this effort with more than 1,500 foundations based in the city—one of the highest concentrations in the country. This density reflects Hamburg's unique tradition of aligning economic success with civic engagement. It is a testament to the belief that prosperity must benefit society at large.

The OSCAR UND VERA RITTER-STIFTUNG embodies this ethos, focusing on the advancement of musical talent. Its support for aspiring musicians—through scholarships, grants, and mentorship programs—empowers young artists to realize their potential and enrich cultural life in Germany and beyond.

This commitment is not limited to Hamburg. The foundation's international scope amplifies its impact, providing opportunities for exceptional talent worldwide. Many of its former scholarship recipients have achieved significant recognition, a testament to the foundation's enduring legacy and its sustainable contribution to the arts.

The foundation's connection to TROPAG underscores an essential principle of our sustainability philosophy: economic success is not an end in itself but a means to benefit society. The achievements of the OSCAR UND VERA RITTER-STIFTUNG reflect this principle, demonstrating how financial prosperity can create lasting cultural and social value.

Hamburg's status as a hub of philanthropy amplifies the importance of this work. The city's foundations have historically played a critical role in shaping its identity as a center of trade, culture, and innovation. The OSCAR UND VERA RITTER-STIFTUNG contributes to this legacy, representing the city's commitment to nurturing talent and fostering global connections.

The foundation's focus on music as a medium of cultural expression aligns with TROPAG's broader sustainability goals. By investing in the arts, we contribute to a more inclusive, creative, and resilient society. The foundation's achievements, and the milestones reached by its alumni, affirm the sustainability of its mission and its positive influence on future generations.

Through its connection to the OSCAR UND VERA RITTER-STIFTUNG, TROPAG reinforces its role as a responsible corporate citizen. By supporting initiatives that extend beyond economic metrics to encompass cultural and social advancement, we demonstrate that sustainability is not just about environmental stewardship but also about enriching lives and communities.

This harmonious interplay of commerce, culture, and civic responsibility is central to Hamburg's heritage and remains at the heart of TROPAG's mission. Together with the foundation, we are proud to contribute to a future where economic success is synonymous with human progress.

## 3.2 Engagement in External Initiatives and Memberships

GRI 2-23 | GRI 2-24 | GRI 2-28

### 3.2.1 UN Global Compact Initiative

GRI 2-23 | GRI 2-24

In 2024, TROPAG proudly joined the UN Global Compact Initiative, aligning with both its international and German chapters. This step underscores our unwavering commitment to integrating sustainability, ethics, and social responsibility into every facet of our operations.

The UN Global Compact is the world's largest corporate sustainability initiative, uniting businesses and organizations worldwide in pursuit of a common vision: a sustainable and inclusive global economy. The initiative is built upon Ten Principles in the areas of human rights, labor, environment, and anti-corruption. These principles provide a universal framework for businesses to operate responsibly and support the advancement of broader societal goals, such as the United Nations Sustainable Development Goals (SDGs).

For companies engaged in international trade, such as TROPAG, the UN Global Compact is of particular significance. It encourages businesses to address the unique challenges and opportunities posed by global supply chains and international markets. By fostering collaboration, transparency, and accountability, the initiative helps organizations drive positive change, not only within their operations but also across their value chains and the broader communities they impact.

At TROPAG, the principles of the UN Global Compact are not new concepts—they are deeply embedded in our organizational DNA. Our long-standing commitment to ethical trade practices, environmental stewardship, and social equity aligns seamlessly with the initiative's goals. Joining the UN Global Compact is a natural extension of our values and a testament to our dedication to making a meaningful contribution to sustainable development.

As a member of this esteemed initiative, TROPAG will continue to strengthen its efforts to uphold these principles, ensuring that they are reflected in our strategies, decisions, and daily operations. We are committed to collaborating with stakeholders to promote responsible business practices, champion sustainability, and support global efforts to build a better future for all.

This milestone marks an exciting chapter in TROPAG's journey toward a more sustainable and inclusive future, reinforcing our role as a responsible and forward-thinking participant in the global economy.

### 3.2.2 Assembly of Honourable Merchants in Hamburg

GRI 2-23 | GRI 2-24

TROPAG is proud to be a long-standing member of the “Versammlung Eines Ehrbaren Kaufmanns zu Hamburg e.V.” (VEHK), an organization deeply rooted in the Hanseatic tradition of honorable trade. Through this membership, TROPAG reaffirms its commitment to ethical business practices that balance entrepreneurial ambition with social responsibility. This ethos has been at the heart of our operations for decades, guiding us as a trusted partner in international trade.

The concept of the "Ehrbarer Kaufmann" (honorable merchant) originates from Hamburg's historical role as a leading center of international trade. It emphasizes principles such as integrity, reliability, fairness, and responsibility in all business dealings. For the VEHK, these timeless values remain critical in navigating modern business challenges. Members are encouraged to conduct their operations transparently, prioritize long-term value creation, and consider the broader impact of their actions on society and the environment.

TROPAG's dual alignment with the VEHK and the UN Global Compact reflects a harmonious relationship between Hamburg's local traditions and global sustainability goals. Both initiatives share a common vision of ethical business conduct and responsible leadership:

**Human Rights and Labor Standards:** Like the UN Global Compact, the VEHK promotes respect for human dignity and fairness in the workplace. TROPAG's adherence to these values ensures that our supply chains are fair, safe, and inclusive.

**Environmental Responsibility:** Both frameworks emphasize the importance of environmental stewardship. TROPAG actively supports sustainable practices that align with the UN's Sustainable Development Goals and the VEHK's call for prudent resource management.

**Anti-Corruption:** A cornerstone of the honorable merchant philosophy is acting with integrity. This aligns directly with the UN Global Compact's principle of combating corruption in all its forms.

Hamburg, as a historically significant hub for international commerce, has long been a leader in promoting ethical trade principles. The city's unique blend of tradition and innovation has made it a beacon for global business standards. The VEHK embodies this legacy by fostering a culture of responsibility, trust, and excellence among its members.

Hamburg's influence extends beyond its borders, providing a model for sustainable and ethical business practices worldwide. The city's commitment to balancing economic success with social and environmental responsibility resonates deeply with TROPAG's values and our membership in the UN Global Compact.

Through our membership in the VEHK, TROPAG continues to uphold the highest standards of business integrity while contributing to a global movement for sustainable development. This dual commitment reinforces our role as a responsible corporate citizen, dedicated to advancing sustainability, fairness, and ethical commerce in every market we serve.

By integrating these principles into our daily operations, we honor the legacy of Hamburg's trading tradition while embracing the future of responsible global trade.

### 3.2.3 Founding Member of BeST

GRI 2-23 | GRI 2-24

In 2011, TROPAG became a founding member<sup>4</sup> of the Beryllium Science and Technology Association (BeST), a nonprofit organisation headquartered in Brussels<sup>5</sup>.

BeST is dedicated to advancing the understanding of beryllium's properties, promoting safe handling practices, and fostering collaboration among stakeholders in industry, government, and research, as well as providing the best available scientific information on beryllium, ensuring that its benefits to society in critical applications—ranging from aerospace and electronics to energy and safety technologies.

As a central representative body, BeST presents the views of the beryllium industry to EU institutions, member states, national governments and parliaments, as well as to other relevant organisations and stakeholders. The association acts as a research and statistical centre, aggregating and publishing market data and providing scientifically-based analysis on the safe use of beryllium. Further, BeST serves as a technical resource, offering guidance and advice on legal and regulatory developments, and providing a forum for the exchange of non-competitive information across the industry.

A key objective is to promote sound policies, regulations, and best practices related to the safe handling of beryllium, with a strong focus on protecting workers and advancing occupational safety. BeST additionally advocates for beryllium as a critical raw material for modern society, underlining its economic and societal value.

TROPAG's active engagement as a founding member not only underscores our commitment to industry leadership in safety, transparency, and innovation, but also demonstrates our dedication to cross-sector collaboration and knowledge-sharing in the responsible use of beryllium. Through BeST, we contribute to shaping responsible policy, fostering scientific exchange, and promoting sustainable growth in industries where beryllium is essential.

### 3.2.4 EU OSHA Partnership

GRI 2-23 | GRI 2-24

In recognition of its commitment to occupational health and safety, BeST applied for and was granted membership in the EU OSHA initiative "Healthy Workplaces – Manage Dangerous Substances". This partnership underscores the alignment of BeST's goals with the EU's broader mission to promote safe working environments. TROPAG actively supports this initiative, further demonstrating its dedication to protecting workers' health and well-being.

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<sup>4</sup> <https://www.beryllium.eu/membership>

<sup>5</sup> Beryllium Science & Technology Association, Rue Belliard 205, 1040 Brussels

### 3.3 Labor and Human Rights

GRI 2-7 | GRI 2-8 | GRI 202-2

TROPAG is fully committed to upholding the core labor standards enshrined in the UN Global Compact and International Labour Organization (ILO) conventions, particularly regarding freedom of association, the prohibition of forced and child labor, and the prevention of discrimination. These standards also extend to TROPAG’s suppliers. TROPAG uniformly pays all statutory social security contributions for its employees on time, in accordance with legal requirements. The predominant form of employment is permanent full-time contracts, reflecting the company’s commitment to long-term employment stability and professional development. The use of temporary or fixed-term contracts is negligible, and all personnel are integrated into the company’s operational structure. All senior management positions are filled by individuals from the local community. No senior executives are hired from outside the region.

There were no labor court disputes recorded during the reporting period, reflecting a stable and constructive social partnership.

In 2024, TROPAG employed a total of 34 individuals. All employees are directly engaged by the company; there are no significant numbers of non-employee workers such as agency personnel, subcontractors, or freelancers within the scope of this report.

During the reporting period, two employees left TROPAG while three new employees joined the organization. These movements correspond to a turnover rate of 14% for the year, as calculated in accordance with the criteria set out by the AGA. Of the 14% turnover rate recorded in 2024, all departures were classified as “influenceable” according to AGA standards. Notably, the sector average recorded by the AGA in 2022 was 16.4%, placing TROPAG below the industry benchmark.

TROPAG maintains a high rate of employee retention: the average tenure stood at 13.35 years in 2024. Remarkably, 29 out of 34 employees have been with the company for more than a decade. In 2026, we will celebrate one 5-year anniversary, one 10-year anniversary, two 15-year anniversaries, one 20-year anniversary, one 25-year anniversary, and one 35-year anniversary, further underscoring the strength of long-term employee relationships.

The overall sickness rate for TROPAG employees in 2024 was 4.5%, which is significantly lower than the industry average of 8.4%. This below-average absenteeism rate is seen as an indicator of good working conditions, employee engagement, and the effectiveness of occupational health and safety measures.

Indicators such as the low sickness rate, reduced turnover rate compared to industry norms, and the substantial average length of service collectively demonstrate a high level of employee satisfaction and organizational loyalty.

During the reporting period, there were no changes to employment conditions, no significant events, and no restructuring measures at TROPAG. All employment terms and organizational structures remained consistent throughout the year.

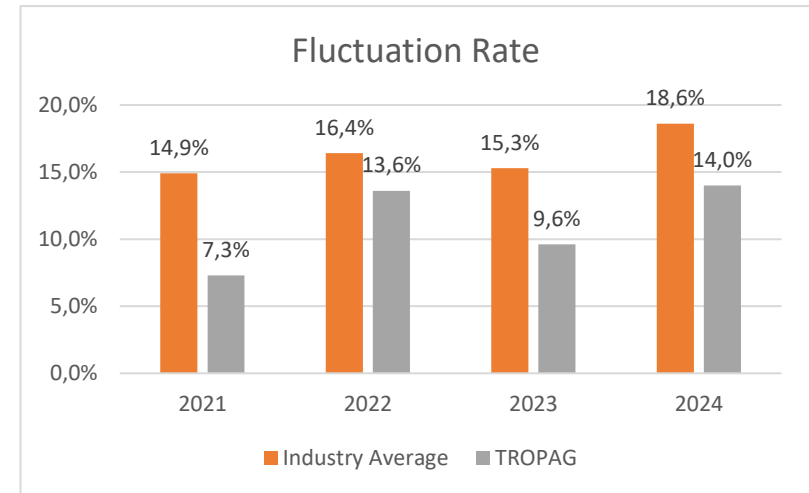


Figure 7: Fluctuation Rate Evolution

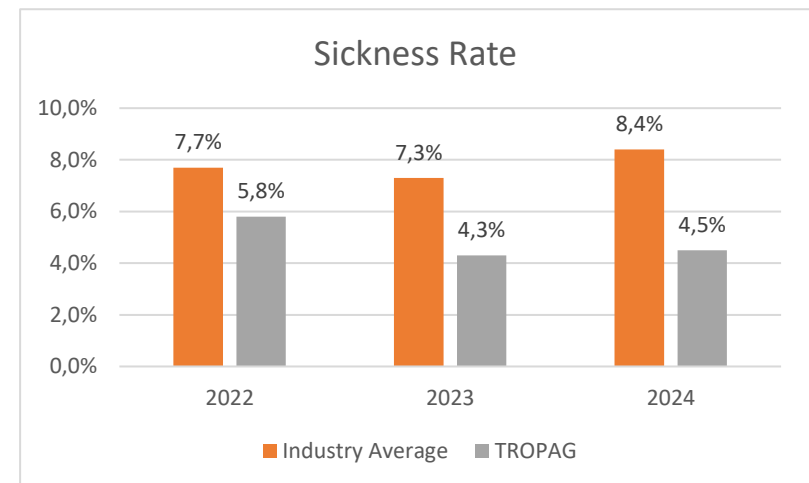


Figure 8: Sickness Rate Evolution

### 3.3.1 Occupational Health and Safety

GRI 403-1 | GRI 403-2 | GRI 403-3 | GRI 403-4 | GRI 403-6 | GRI 403-7 | GRI 403-8 | GRI 403-9 | GRI 403-10

Occupational health and safety is a central priority of our company. Our occupational health and safety management system is fully aligned with the stringent requirements of German legislation for companies with more than 30 employees. All employees are covered by this system, which is regularly updated and subject to continuous improvement.

Comprehensive risk assessments are conducted for all work areas. In addition to general workplace evaluations, special attention is given to the specific demands of office work, including ergonomic risks and visual strain from screen-based activities. Psychological risks are also systematically assessed in order to identify and address potential mental health stresses in the workplace. Where necessary, preventive and corrective measures are implemented to ensure the well-being of our staff.

The well-being of employees is further supported by regular examinations and workplace inspections by an occupational physician, as required by German law. These include mandatory eye examinations, as well as the proactive offering of free vaccination programs for employees, such as annual influenza vaccinations provided on site. We also offer voluntary financial subsidies for specific workplace related computer glasses to further promote eye health and comfort at work. These initiatives exceed statutory requirements and underscore our commitment to maintaining a healthy and safe working environment.

All employees are mandatorily insured under the German health insurance system. Throughout 2024, there were no reported work-related injuries or cases of work-related ill health. Any incidents, near-misses, or identified risks are thoroughly investigated and used to further develop our occupational health and safety measures.

To ensure transparent reporting on occupational health and safety performance, we apply the following standard formulas for Lost Time Injury (LTI) Key Performance Indicators (KPIs):

Lost Time Injury Frequency Rate (LTIFR)

$$\text{LTIFR} = (\text{Number of lost time injuries} \times 1,000,000) / \text{Actual worked hours by employees}$$

This indicator reflects the number of work-related injuries leading to lost time per one million hours worked.

Lost Time Injury Severity Rate (LTISR)

$$\text{LTISR} = (\text{Number of days lost due to occupational accidents} \times 1,000) / \text{Actual worked hours by employees}$$

This indicator measures the severity of occupational injuries by indicating the number of lost days per one thousand hours worked.

The number of actual worked hours is determined as:

$$\text{Theoretical worked hours} + \text{Overtime hours} - \text{Absence hours}$$

In 2024, 2023 and 2022, both the LTIFR and LTISR were zero, as no work-related injuries or ill health cases were reported.

Given the predominantly office-based nature of our operations, the risk of significant occupational health and safety impacts arising directly from business relationships (e.g., suppliers or service providers) is considered low. Nevertheless, all business partners are required to comply with relevant occupational health and safety regulations. Should relevant risks be identified, appropriate preventive and mitigative actions would be taken.

### 3.3.2 Education and Training

GRI 404-2

At TROPAG Oscar H. Ritter Nachf. GmbH, we firmly believe that well-trained, motivated employees are the foundation of customer satisfaction and long-term economic success. Our commitment to targeted recruitment and comprehensive training initiatives not only enhances employee satisfaction but also drives the continuous optimization of our internal processes, methods, and standards.

TROPAG is dedicated to fostering the skills and talents of its workforce. We offer a wide range of opportunities for both professional and personal development, ensuring our employees are well-equipped to meet the demands of an evolving business landscape. Continuous, individualized support forms the core of our training philosophy, aligned with our corporate values and supported through targeted development initiatives and regular feedback loops. These are essential elements of every training program we offer.

To meet the diverse needs of our employees and ensure a high standard of competency across all departments, TROPAG provides a variety of learning programs tailored to specific topics. These include:

- General Equal Treatment Act (AGG) – Promoting equality and preventing discrimination in the workplace.
- Onboarding for New Employees – Ensuring a smooth and effective integration into the company culture and operational processes.
- Occupational Safety – Creating a safe and compliant working environment for all employees.
- Monthly Training Promotions – Ongoing learning initiatives tailored to current and relevant business topics.
- Handling of Hazardous Goods and Substances / Expertise Training – Ensuring safety and compliance in dealing with sensitive materials.
- Compliance Management in Purchasing – Reinforcing ethical standards and legal compliance throughout procurement processes.
- Tax Law, Customs and Foreign Trade Law, Social Security – Strengthening legal knowledge relevant to our global operations.
- Artificial Intelligence (AI) and Cyber Security – Enhancing digital competencies and ensuring data protection.
- Carbon Border Adjustment Mechanism (CBAM) – Educating staff on sustainability-related regulatory frameworks.
- Telephone Training – Improving communication skills for internal and external stakeholder engagement.
- Exam Preparation and Stress Management – Supporting personal development and resilience in high-performance environments.
- Sustainability Training – Promoting environmental responsibility and aligning employee action with the company's sustainability goals.

Through these comprehensive training measures, TROPAG ensures that continuing education and employee qualification are central pillars of our corporate strategy. This investment in human capital not only strengthens our internal capabilities but also supports our overarching commitment to sustainable development and responsible business practices.

In addition to its broad range of training programs, TROPAG is also a recognized training company. During the reporting year, TROPAG employed two dual-study students, underscoring its commitment to fostering young talent and investing in the next generation of skilled professionals. By combining academic education with practical, hands-on experience, TROPAG supports a well-rounded approach to learning that benefits both the individual and the organization. This initiative reflects the company's long-term vision of building a qualified and future-ready workforce.

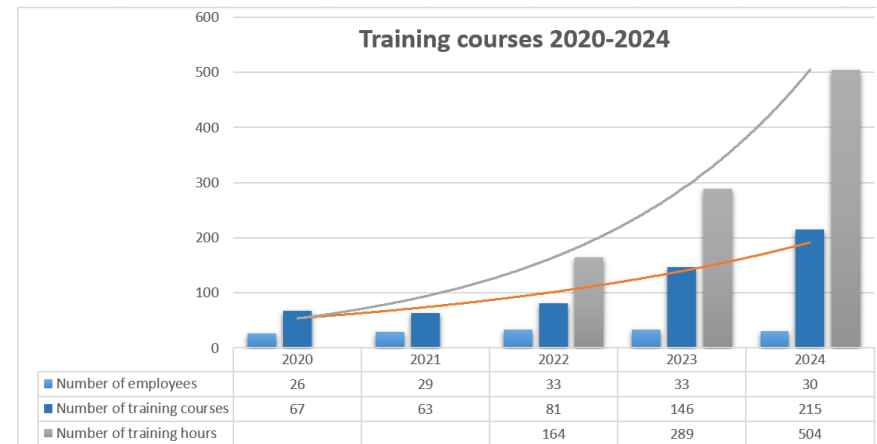


Figure 9: Evolution of training courses 2020-2024

### 3.3.2.1 Regular Performance and Career Development Reviews

GRI 404-3

At TROPAG, regular performance and career development reviews are an integral part of our employee development strategy. These evaluations are conducted annually at the beginning of the year and serve as a structured opportunity to provide employees with comprehensive feedback on their performance over the preceding period.

The performance review process is designed to recognize individual contributions, identify development potential, and support long-term career planning. It also helps to uncover performance gaps, which can then be addressed through targeted support and personalized development measures. This approach ensures that each employee receives the guidance and tools necessary to grow within their role and contribute meaningfully to the company's success.

Through this system of continuous feedback and development, TROPAG strengthens employee engagement, promotes transparent communication, and fosters a culture of continuous improvement and personal growth..

### 3.3.2.2 Training Intensity

GRI 404-1

Over the years, TROPAG has seen a continuous increase in both the number of training sessions per employee and the average training hours per employee. The significant rise in 2024 can be attributed to several key factors. On the one hand, the growing demand for further education highlights the increasing importance of continuous qualification. On the other hand, TROPAG introduced new training programs that are more closely aligned with employee needs and designed to be more engaging and accessible.

Technological advancements—particularly in online learning—have also played a crucial role in this development. Low-threshold digital learning opportunities have significantly improved access to training and boosted participation across the workforce.

The data clearly demonstrates the rising importance of continuous learning within the company. In 2024, the average number of training hours per employee reached 15, marking a noticeable increase compared to 2023. While the number of training sessions per employee continues to grow steadily, training hours per employee are increasing at a slightly stronger rate. As workforce numbers vary over time, key performance indicators (KPIs) calculated per employee provide a meaningful measure of training intensity and effort, allowing for an accurate comparison and evaluation across reporting periods.

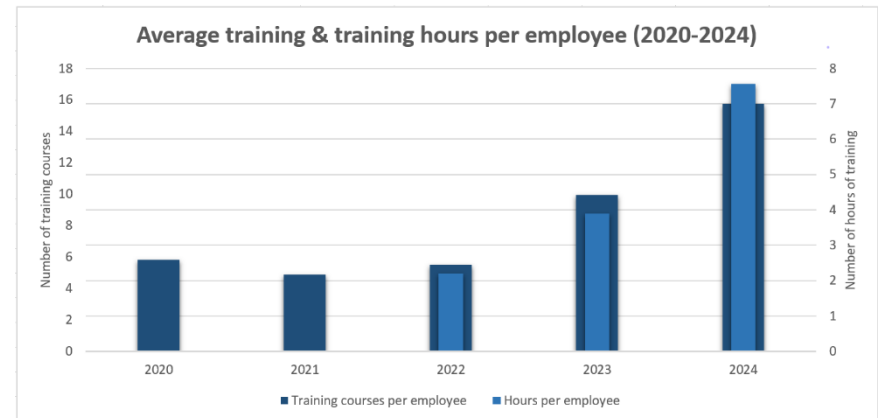


Figure 10: Evolution of average training hours 2020-2024

### 3.3.2.3 Occupational Health and Safety Training

GRI 403-5

Ensuring the health and safety of all employees is a top priority at TROPAG. As part of our occupational health and safety management, various training sessions and emergency drills are conducted regularly to strengthen the emergency preparedness and response capabilities of our workforce. Key components of these efforts include first aid training, evacuation and emergency drills, refresher courses for certified first aiders, and fire safety training.

In the reporting year 2024, TROPAG implemented several targeted training measures that contributed significantly to improving workplace safety:

- **Basic First Aid Training:** A total of eight employees participated in a training session aimed at providing essential knowledge and skills for administering first aid in the event of workplace accidents or medical emergencies.
- **Evacuation Drill:** All employees took part in a company-wide evacuation exercise to practice orderly building evacuation procedures. Escape routes and designated assembly points were tested. In addition, approximately half of the staff received an information sheet with key behavioral guidelines in the event of a fire, including instructions on proper use of fire extinguishers, emergency alerting protocols, and a step-by-step evacuation diagram.
- **Emergency Drill:** Two employees conducted a scenario-based emergency simulation to assess and improve emergency response procedures in the event of fires, accidents, or other critical incidents.
- **First Aid Refresher Course:** One employee completed a refresher course to update and maintain their certification as a company first aider, ensuring continued readiness and confidence in emergency situations.
- **Fire Safety Training:** Four employees were trained as fire protection assistants, learning how to respond effectively to fire incidents, use fire extinguishers, and support evacuation procedures.

These training activities aim to enhance employee confidence and competence in handling emergencies while ensuring that a sufficient number of qualified first aiders and fire safety assistants are available at all times. As of the end of 2024, TROPAG has 12 certified first aiders and 5 trained fire safety assistants. The comprehensive training measures have significantly strengthened the company's emergency preparedness and safety culture.

### 3.3.2.4 Handling of Hazardous Goods and Substances

GRI 403-5

Another important training course for new Tropag employees in chemical wholesale covers the topics of dangerous goods, hazardous substances, and expertise as an essential component. The aim of this training is to qualify new employees in chemical wholesale for the safe handling of dangerous goods, hazardous substances, and activities requiring expertise.

The distinction between dangerous goods, hazardous substances, and expertise is an important topic in occupational safety and the transport of hazardous materials.

- **Dangerous goods:** This concerns the transport of dangerous goods in accordance with the Dangerous Goods Regulation (ADR, etc.). The training covers legal regulations, packaging, labeling, documentation, as well as safety measures and behavior in the event of accidents.
- **Hazardous substances:** The handling of hazardous substances in the workplace is subject to the Chemicals Act and the Hazardous Substances Regulation. Information is provided on safe handling, storage, personal protective equipment, risk assessments, and measures to be taken in the event of a release.
- **Expertise:** This area covers legal requirements and specific specialist knowledge required for certain activities, such as handling hazardous substances or testing safety measures.

### 3.3.2.5 Anti-Corruption Training

GRI 205-2

TROPAG recognizes that effective anti-corruption training is essential in fostering a responsible and compliant business environment. To this end, we have established a structured training program designed to educate employees on our strict anti-corruption policies, legal requirements, and best practices.

All new hires receive comprehensive onboarding that includes dedicated modules on corporate compliance, anti-corruption policies, and practical guidance for identifying and handling risk situations. Existing employees regularly participate in refresher training sessions to stay up to date with regulatory changes and internal procedures. Training content covers, among other topics:

- The legal and organizational framework for anti-corruption (including relevant European regulations)
- Handling of gifts, hospitality, and potential conflicts of interest
- Reporting channels and procedures for suspected violations
- Practical case studies for real-world application

In the reporting year, anti-corruption training was offered as part of both general compliance and topic-specific education, utilizing several digital learning platforms. This approach ensured broad participation, enabled flexible access, and promoted engagement with the learning material. The training program reached all employees whose roles may expose them to corruption risk, with participation tracked and documented.

Training effectiveness is regularly reviewed through feedback, participant assessments, and, where appropriate, knowledge checks. Lessons learned are systematically integrated into future training cycles to address emerging risks and reinforce a culture of integrity.

### 3.3.3 Equality

GRI 2-23 | GRI 2-24

At TROPAG, diversity and inclusion are not just values; they are integral to our success. By fostering an inclusive culture internally and promoting ethical practices externally, we continue to contribute to a sustainable and socially responsible future.

Historically, Oscar H. Ritter's relationship with his staff was strongly influenced by Catholic social teachings and his actions were guided in particular by the principle of subsidiarity and helping people to help themselves, based on promoting the personal responsibility of the individual as part of a team-oriented community. Oscar H. Ritter not only transferred the greatest possible degree of responsibility to his staff in their respective fields, where necessary he also vouched for them, as in the case of Edeltraud Hain, who, in 1949, was the first woman he employed following the Second World War. Among other things, Oscar H. Ritter provided her with a rent deposit because it was very difficult for women living alone to find accommodation after the war.

It stands out that even as early as the 1950s, more women than men worked for TROPAG, not only as secretaries, but also as responsible merchants with power of attorney. Oscar H. Ritter's attitude to his staff was open and modern. For example, he quickly introduced the five-day-week. The custom of awarding staff a half-day off on their birthday, a custom still in place today, can also be traced back to Oscar H. Ritter. He arranged for staff to be paid 'birthday money' to



allow them to invite colleagues to have birthday cake at a time when butter and sugar were still rarities. His commitment characterized the company climate: TROPAG staff were endowed with a strong sense of solidarity and regarded the company as a 'second family'.

### 3.3.3.1 *Protection of Personal Rights and Handling of Diversity Data*

GRI 2-23 | GRI 2-24

The protection of employees' personal rights is a top priority for us. As a company with a comparatively small workforce, we are acutely aware that explicitly stating individual characteristics such as origin, ethnicity, or migration background carries data privacy risks. In a compact team, such information could easily be linked to specific, personally identifiable individuals, which would contravene our strict data privacy and personal rights policies.

We emphasize that diversity is both an asset and a lived reality within our company. However, we recognize that disclosing certain personal characteristics could unintentionally highlight individual differences rather than reinforce the normalcy and everyday nature of our diverse and inclusive work environment.

For these reasons, we deliberately refrain from collecting or publishing detailed, person-related information regarding origin or migration history within our organization. Instead, we are committed to ensuring that all employees are treated equally and enjoy the same opportunities, regardless of their backgrounds or any other personal characteristics.

### 3.3.3.2 *Equality and Diversity in the Workplace*

GRI 2-7 | GRI 2-23 | GRI 2-24 | GRI 405-1 | GRI 406-1

Like in the past, we firmly believe in providing equal opportunities and modern working conditions for all employees. As an internationally and socially oriented company, we view diversity as a valuable asset. Gender, age, religion, beliefs, origin, or race play no role in hiring or promoting employees. To ensure fairness and prevent discrimination, employees can anonymously report any concerns through a dedicated whistleblower system.

In the reporting year, women made up an average of 70% of TROPAG's workforce, clearly placing the company above the industry average. Women in leadership positions account for 33%, a figure that also significantly exceeds the industry standard. Furthermore, approximately 3.5% of employees belong to minorities or vulnerable groups. This reflects our commitment to fostering an inclusive and diverse working environment, in which all employees are respected and valued regardless of their background or individual circumstances.

No cases of discrimination were reported during the reporting period. Established preventive measures and accessible reporting channels are in place to ensure that all employees can speak up in case of suspected discrimination. This ongoing vigilance demonstrates the effectiveness of our equality and anti-discrimination policies and underscores our commitment to a fair and respectful workplace.



Edeltraud Hain was born in Berlin. During the Second World War she made her way to Travemünde, where she worked for the aviation ministry. At the end of the war she found a job there as a secretary in the housing office. Her superior was Rudolf Horl, who recommended her to Oscar H. Ritter when he was looking for a secretary for TROPAG. Edeltraud Hain was hired on 1 January 1949, the first woman after the Second World War. Until then, the company had been entirely a male domain. Edeltraud Hain was inquisitive, asked questions and thus with time gained the insider knowledge a trader needs. At a time when it was still very unusual for women to work in foreign trade, Oscar H. Ritter made her a merchant and sent her to international seller and supplier conferences. Edeltraud Hain held her own in this man's world and was given power of attorney in 1959. When Rudolf Horl moved into the company management following Oscar H. Ritter's death in 1967, Edeltraud Hain took over management of the ores department from him. She remained the only woman at international conferences into the 1970s.

3.3.3.3 Promoting Diversity in Recruitment

GRI 405-1 | GRI 406-1

TROPAG places great importance on internationality and diversity in its workforce and actively recruits employees from various nations. In line with our commitment to fostering diversity, we prioritize social, cultural, religious, and ethnic diversity in our recruitment processes. This approach is not only beneficial for the organization but also enables us to leverage the unique perspectives and talents of our employees. By intentionally integrating the diverse backgrounds of potential candidates, we aim to expand our capabilities and mirror our international presence within the company.

In line with applicable data protection regulations and our own commitment to privacy, individual information or specific backgrounds are not disclosed.

3.3.3.4 Inclusion for Employees with Disabilities

GRI 2-23 | GRI 2-24 | GRI 405-1

In 2022, an employee was classified as severely disabled. TROPAG responded by making tailored adjustments to the workplace to accommodate specific needs. This reflects our commitment to inclusivity and the well-being of every team member.

3.3.4 Commitment to Human Rights and Labor Standards

GRI 408-1 | GRI 409-1 | GRI 410-1 | GRI 411-1 | GRI 412-1 | GRI 412-3 | GRI 414-1 | GRI 414-2

TROPAG is fully committed to upholding the core labor standards outlined in the UN Global Compact. This includes respecting freedom of association, prohibiting forced labor, eradicating child labor, and preventing discrimination. Our commitment extends beyond our own operations to include our suppliers, from whom we also demand strict adherence to human rights.

3.3.4.1 Monitoring Human Rights Compliance

GRI 408-1 | GRI 409-1 | GRI 412-1 | GRI 414-1 | GRI 414-2

During the reporting period of 2024, no violations of human rights were identified among our suppliers or customers. To ensure compliance, human rights adherence is assessed on a sample basis during site visits to suppliers and customers. If concerns arise, product managers are instructed to investigate the situation further, including consulting local NGOs or trade unions where necessary.

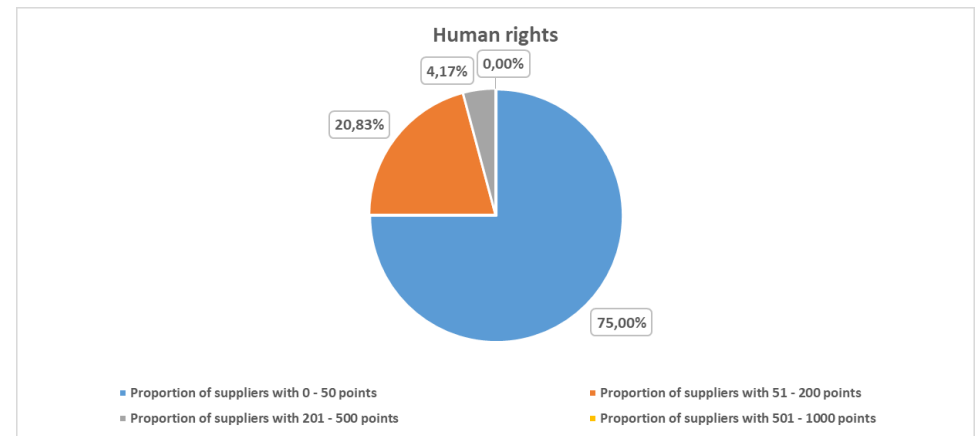


Figure 11: Risk assessment - Human rights

### 3.3.4.2 *Supplier Risk Assessment*

GRI 412-2 | GRI 414-1 | GRI 414-2

A dedicated risk assessment was conducted in 2024 to estimate the likelihood of human rights violations within a majority of our supply chain. The assessment found that:

- **75.00%** of suppliers posed a **low risk** of human rights violations.
- **20.83%** of suppliers exhibited a **moderate risk**.
- Only **4.17%** of suppliers were categorized as having a **slightly elevated risk**.

No suppliers were rated as high-risk.

Suppliers identified with slightly elevated risks are subject to detailed evaluations by a cross-functional team. This process includes the implementation of corrective or preventive measures to mitigate or eliminate risks.

### 3.3.4.3 *Proactive Measures for Human Rights Protection*

GRI 414-2 | GRI 408-1 | GRI 409-1 | GRI 412-3

TROPAG is dedicated to ongoing monitoring of the market to identify potential human rights violations by suppliers or customers. This includes child labor and forced or compulsory labor.

If evidence of a violation is discovered, the supplier is promptly audited to verify the situation and, if necessary, corrective actions are agreed upon. Should the supplier fail to resolve the issue or provide evidence of compliance, TROPAG terminates the business relationship.

By carefully selecting suppliers and, where necessary, providing guidance and support, we aim to prevent human rights violations across our supply chain. This proactive approach ensures that ethical and sustainable practices remain integral to our operations.

### 3.3.4.4 *Ensuring Fair Practices Across the Supply Chain*

GRI 406-1 | GRI 414-1 | GRI 414-2

Our dedication to equality, non-discrimination and fair working conditions extends to our supply chain. We place great emphasis on preventing workplace discrimination and maintaining a pleasant working environment among our suppliers. To this end, a majority of our suppliers underwent a risk assessment evaluating the likelihood and severity of discrimination-related risks and risks regarding working conditions.

The results revealed that **79.17%** of suppliers posed **no or minimal risk**. Additionally, a **moderate risk** was identified for **16.67%** of suppliers, while a **slightly elevated risk** was noted for **4.17%**. Notably, no high-risk cases were found among the assessed key suppliers.

Suppliers identified with a slightly elevated risk undergo an in-depth evaluation by a dedicated team. This process includes the implementation of corrective or preventive measures, if necessary.

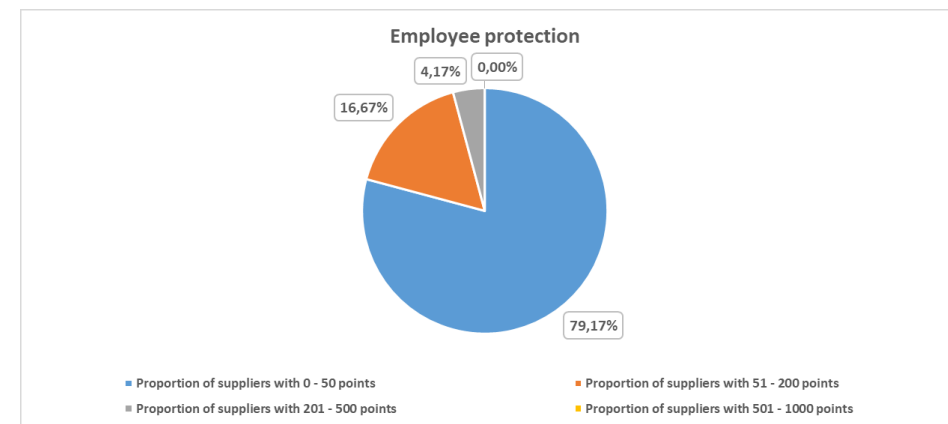


Figure 12: Supplier Risk Assessment - Employee Protection

### 3.3.5 Governance, Compliance, and Security

GRI 2-23 | GRI 2-24 | GRI 3-3 | GRI 206-1

At TROPAG, we continuously identify and assess the general risks associated with our various processes and in relation to all stakeholders. Our employees are encouraged to review commercial, legal, deadline-related, and technical risks for each order. This approach is guided by the principles of sustainability and adherence to our Code of Conduct<sup>6</sup>. When collaborating with suppliers in emerging or developing countries, we utilize the advisory services provided by the Federal Office for Economic Affairs and Export Control (BAFA) and our insurers, among other resources.

To ensure the highest standards are met, our suppliers are carefully monitored. During on-site visits, we conduct audits to assess and verify their compliance with our sustainability standards. This rigorous approach enables us to mitigate potential risks and capitalize on opportunities that align with our values and commitment to responsible business practices.

By prioritizing transparency, accountability, and sustainability, we foster a culture of trust and integrity, both within our organization and throughout our supply chain. Our dedication to responsible business practices is reflected in our ongoing efforts to minimize risks, maximize opportunities, and promote long-term partnerships with suppliers who share our commitment to sustainable development and ethical business conduct.

Our commitment to sustainability and responsible business practices is rooted in our philosophy<sup>7</sup>. We also draw on external resources, such as the CSR risk checks<sup>8</sup>, to inform our risk management strategies and ensure we are meeting the highest standards of sustainability and social responsibility.

During the reporting period, there were no legal actions brought against TROPAG for anti-competitive behavior, anti-trust, or monopoly practices. No investigations, pending cases, or finalized proceedings were identified. This reflects our ongoing commitment to compliance with all applicable competition laws and ethical business conduct across our operations.

#### 3.3.5.1 *Anti-Corruption and Compliance*

GRI 2-23 | GRI 2-24 | GRI 205-3

Integrity forms the foundation of our corporate culture and business conduct. At TROPAG, we have established comprehensive compliance structures and procedures to ensure a clear, organization-wide commitment to anti-corruption.

Our Code of Conduct and Compliance Guidelines outline strict prohibitions against all forms of corruption and bribery. These principles are binding for every employee, regardless of their role or seniority. Responsibility for overseeing compliance lies with the designated Compliance Officer, who operates on behalf of the management board. The Compliance Officer monitors adherence to all requirements, provides comprehensive advice to staff, and routinely reports compliance performance and potential areas for improvement to senior management.

To ensure a strong culture of awareness, TROPAG regularly informs employees about relevant legal standards and internal requirements through training programs, written updates, and meetings. Employees are actively encouraged to seek guidance from the Compliance Officer if questions or uncertainties arise—especially regarding the handling of gifts, hospitality, sponsorship, donations, or relations with public officials, customers, and suppliers.

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<sup>6</sup> [https://tropag.com/fileadmin/downloads/Tropag\\_Suppliers\\_CoC.pdf](https://tropag.com/fileadmin/downloads/Tropag_Suppliers_CoC.pdf)

<sup>7</sup> <https://tropag.com/unternehmen/nachhaltigkeit/>

<sup>8</sup> Beispiel: <https://www.mvorisicochecker.nl/de/csr-risiko-check>

Systematic risk assessments are conducted to identify potential vulnerabilities and to ensure robust preventive controls across all operations, including procurement and sales. Regular internal and, where appropriate, external audits take place to review compliance with anti-corruption policies. These procedures are integral components of our Quality Management System and are constantly reviewed for effectiveness in accordance with relevant international standards.

TROPAG maintains a well-structured incident reporting process that allows employees to confidentially report any suspicions or observed violations of anti-corruption rules. All incidents are handled with strict confidentiality and are systematically investigated. Corrective actions are promptly initiated if any shortcomings are determined, and the effectiveness of these measures is subsequently verified.

During the reporting period, no incidents of corruption or bribery were reported, nor were any identified through internal monitoring or audits. Nevertheless, we continually refine our compliance program based on internal evaluations, audit results, best practices, and the changing regulatory landscape.

We recognize that the fight against corruption is an ongoing responsibility. To strengthen stakeholder trust, we maintain transparency in our processes and regularly review and update our compliance system to align with current regulations and best-practice standards.

#### 3.3.5.2 *Whistleblower Procedure and Reporting Mechanism*

GRI 2-25 | GRI 2-26 | GRI 205-2 | GRI 205-3

TROPAG promotes a culture of transparency and trust. All employees are encouraged to confidentially report any identified or potential issues within the company or in dealings with suppliers, customers, and authorities. These reports are handled promptly and confidentially by the management team to ensure that appropriate actions are taken.

The significance of whistleblower policies has grown in light of evolving regulatory frameworks at both the national and European levels. The EU Whistleblowing Directive (Directive (EU) 2019/1937) or the German Hinweisgeberschutzgesetz (HinSchG), which came into force in July 2023, implements this directive and mandates that organizations with more than 50 employees establish secure and anonymous channels for reporting misconduct.

While TROPAG is not legally obligated to comply with these requirements, the company voluntarily aligns its practices with these principles to ensure transparency and accountability at all levels.

The Whistleblower Procedure<sup>9</sup> used within the organisation guarantees absolute confidentiality to those who come forward with genuine concerns. This assurance is pivotal in encouraging employees to report issues without fear of retaliation. This proactive adoption ensures that employees feel empowered to voice concerns and that any potential risks are identified and addressed early.

As in previous years, there were no incidents reported in 2024, neither internally, nor externally. This outcome reflects the continued commitment of all employees to uphold ethical standards and the effectiveness of the company's internal control and reporting systems. The absence of reported issues also reinforces the trust placed in TROPAG's whistleblower procedures and the positive impact of fostering a transparent and responsible corporate culture.

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<sup>9</sup> <https://www.globaleaks.org/>

### 3.3.5.3 Information Security

GRI 2-23 | GRI 2-24 | GRI 418-1

The NIS2 Directive, adopted by the European Union, sets forth a framework aimed at enhancing cybersecurity and operational resilience across critical sectors. As defined under the IT Security Act and its specific regulations for the chemical sector in Germany, TROPAG qualifies as an entity under the NIS2 Directive due to its involvement in chemical trading and its annual revenue exceeding €10 million. While we await the transposition of NIS2 into German national law, we have initiated comprehensive preparations to meet the directive's stringent requirements. TROPAG is therefore considered an "important facility", which also requires registration and reporting of incidents to the "Bundesamt für Sicherheit in der Informationstechnik" (BSI), as well as the creation of a "Business Continuity Management System" (BCMS). Key focus areas include:

- Risk Management and Governance:
  - Establishing robust risk management processes to identify, assess, and mitigate cybersecurity risks.
  - Strengthening governance structures to ensure clear accountability for cybersecurity measures within our organization.
- Incident Response and Reporting:
  - Developing and testing incident response plans to ensure swift and effective handling of cybersecurity incidents.
  - Preparing for compliance with reporting obligations, ensuring timely communication of incidents to relevant authorities and stakeholders.
- Supply Chain Security:
  - Enhancing security measures within our supply chain to minimize vulnerabilities stemming from third-party relationships.
  - Collaborating with partners and suppliers to uphold shared cybersecurity standards.
- Employee Training and Awareness:
  - Implementing ongoing training programs to equip our employees with the knowledge and skills needed to recognize and respond to cybersecurity threats.

By taking these measures, TROPAG aims not only to comply with NIS2 but also to reinforce our overall resilience against digital threats, thereby securing our operations and ensuring uninterrupted service to our customers and partners. At TROPAG, we recognize the intrinsic connection between robust cybersecurity measures and the safeguarding of customer data.

- Data Protection Frameworks:
  - Continuously enhancing our data protection policies and practices to align with both NIS2 requirements and the General Data Protection Regulation (GDPR).
  - Ensuring transparency in how customer data is collected, processed, and stored.
- Privacy-by-Design Principles:
  - Embedding privacy considerations into the design of our processes and systems to minimize data protection risks.
  - Conducting regular data protection impact assessments to identify and address potential vulnerabilities.
- Monitoring and Accountability:
  - Establishing mechanisms for monitoring compliance with data protection standards.
  - Reporting on privacy-related incidents and implementing corrective actions to prevent recurrence.
- Customer Engagement:
  - Maintaining open channels of communication with our customers to address their concerns regarding data privacy.
  - Providing clear and accessible information on how we handle their data and protect their rights.

As we await the finalization of NIS2's implementation into German law, which is expected around October 2025, we will continue to monitor developments closely and adapt our strategies accordingly.

There were no substantiated complaints or detected incidents related to breaches of customer privacy or losses of customer data during the reporting period.

### 3.3.5.4 REACH and SVHC

GRI 2-23 | GRI 2-24 | GRI 416-1 | GRI 416-2 | GRI 417-1

Since the implementation of the REACH Regulation (Registration, Evaluation, Authorization, and Restriction of Chemicals) on June 1, 2007, TROPAG has consistently prioritized compliance with its requirements to ensure the safe use of substances and provide planning security for our customers. Under REACH, no substance in quantities exceeding one tonne per year may be manufactured or imported into the EU without at least being pre-registered. This regulation extends to substances in mixtures and, under specific conditions, to those in articles.

The REACH regulation provided transition periods of 3.5 to 11 years, depending on quantities and the health and environmental classifications of substances (Article 23). TROPAG strategically utilized these transition periods to pre-register and successfully register the substances we supply to our customers. By the final registration deadline of May 31, 2018, all relevant substances were registered, with only a few exceptions. These registrations are documented in the corresponding safety data sheets, ensuring transparency and compliance.

TROPAG is also actively engaged in substance consortia to represent our interests and those of our customers within the framework of REACH. In several cases, we assume the role of Lead Registrant, taking on responsibility for dossier preparation, data sharing, and communication with authorities on behalf of all consortium members. Additionally, TROPAG has completed full registration as the importer for various products, thus meeting the highest regulatory standards and ensuring uninterrupted market access for customers. These activities highlight the proactive, expert-driven role of the company in the REACH registration landscape and underscore the importance we place on compliance and industry leadership.

TROPAG remains vigilant in monitoring and adhering to the requirements of the REACH regulation. We actively assess changes in substance classifications and communicate any potential impacts to our customers, ensuring their operations remain uninterrupted and compliant.

To manage our obligations effectively and maintain a comprehensive overview of the registration status of our substances, TROPAG has developed a robust documentation and procedural framework:

- **REACH Substance List:** All TROPAG products are cataloged in a dedicated REACH list, including essential details such as product names, CAS and EINECS numbers, REACH pre-registration and registration numbers, registration status, and the entity responsible for registration (e.g., manufacturer, direct importer, or TROPAG as the importer).
- **Volume Band Monitoring:** Volume bands for the past three years are reviewed to ensure they align with the quantities reported during registration.
- **Safety Data Sheets:** These are regularly updated and reviewed to reflect the most current information, ensuring compliance and safety.
- **Responsibility and Oversight:** Each Product Manager is tasked with maintaining access to the REACH-related data for their products, supported by the sales assistance team and the REACH Compliance Officer, who ensure the list is reviewed and updated regularly.

To stay aligned with evolving regulations, TROPAG carefully reviews the updated SVHC Candidate List published biannually by the European Chemicals Agency (ECHA). This ensures that only compliant products and compositions are distributed.

Key actions include:

- **SVHC Surveillance:** Substances listed on the SVHC Candidate List are subject to continuous monitoring and evaluation.
- **Portfolio Management:** To date, TROPAG has not needed to withdraw any products due to REACH authorisation or restriction requirements.

TROPAG's diligent approach to REACH compliance reflects our commitment to sustainability, safety, and transparency in the management of chemicals. By proactively monitoring regulatory developments and maintaining clear and accurate records, we support our customers in navigating the complexities of chemical safety and regulatory compliance.

No incidents of non-compliance or product withdrawals due to REACH requirements occurred during the reporting period.

### 3.3.5.5 AEO Certification

GRI 2-23 | GRI 2-24

Since the spring of 2009, TROPAG has been among the first companies in Germany to meet the stringent requirements of the **Authorized Economic Operator (AEO F)** certification. This status reflects our commitment to maintaining the highest standards of customs compliance, supply chain security, and trade facilitation.

The AEO F designation, which stands for "**Customs Simplifications/Security and Safety**", is awarded to companies that demonstrate exceptional reliability, compliance with customs regulations, secure handling of goods, and financial solvency. For TROPAG, this certification is not only a recognition of our adherence to international trade standards but also a vital part of our operational excellence and customer service strategy.

To uphold our AEO status and ensure compliance with international regulations, TROPAG has implemented robust systems and procedures:

- **Regular Screening:** All employees, creditors, and debtors are regularly screened against relevant European, UK, and US registers of restricted or sanctioned persons, companies, and organizations using an advanced IT system. This proactive measure ensures that TROPAG maintains full compliance with all applicable trade laws and sanctions.
- **Documentation Accuracy:** By adhering to meticulous processes for preparing customs and transport documents, TROPAG eliminates the risk of errors that could delay shipments or result in customs holds.

In the reporting period, TROPAG successfully avoided any known errors in customs clearance or in the preparation of import/export documentation. This achievement underscores our dedication to operational precision and regulatory compliance, which in turn ensures the seamless movement of goods across borders.

Our AEO certification provides tangible benefits to our customers and partners, including:

- **Minimized Delays:** By preventing delays caused by incomplete or inaccurate paperwork, we ensure timely delivery of goods.
- **Enhanced Security:** Our rigorous screening processes contribute to a secure and trustworthy global supply chain.
- **Reduced Risks:** Compliance with international standards minimizes the risk of supply chain disruptions and ensures uninterrupted service.

TROPAG's approach to customs compliance and supply chain security aligns with our broader sustainability goals. By streamlining processes, reducing the risk of delays, and ensuring adherence to international trade regulations, we not only support economic efficiency but also foster trust and reliability among our global partners.

Our flawless record in customs operations during the reporting period reflects our unwavering commitment to excellence, reinforcing TROPAG's reputation as a responsible and reliable partner in international trade.

## 4 Sustainable Value Chain Management

### 4.1 Supply Chain and Risk Assessment

GRI 3-3 | GRI 308-1 | GRI 308-2 | GRI 407-1 | GRI 408-1 | GRI 409-1 | GRI 412-1 | GRI 414-1 | GRI 414-2 | GRI 2-6 | GRI 2-23

At TROPAG, we source goods from a diverse range of countries. To ensure adherence to globally recognized sustainability principles, we conduct thorough evaluations of our suppliers and service providers. All key suppliers are evaluated regarding their risk of involvement in such practices, in accordance with internationally recognized standards and TROPAG’s Code of Conduct.

Central suppliers, or those with significant commercial, technical, or legal risks, are audited during visits using a standardized questionnaire.

A dedicated risk assessment was also performed to evaluate the likelihood of quality- and sustainability-related risks, as well as potential violations of lawful behavior.

The results indicate that 87.50% of suppliers were categorized as low-risk for quality or sustainability related risk, while for 12.5% a moderate-risk was evaluated. None of the assessed key suppliers were classified as slightly elevated risk or high risk.

TROPAG’s supplier risk assessments explicitly include topics relating to child labor, forced or compulsory labor, and other social and human rights aspects.

The latest assessment revealed that 79.17% of suppliers posed a low risk for potential violations, 16.67% were classified as posing a moderate risk, and 4.17% were identified with a slightly elevated risk. No suppliers were found to pose a high risk of non-compliance.

Suppliers identified as moderate or slightly elevated risk are subjected to a detailed and extensive evaluation by a specialized team. Additionally, corrective or preventive measures are implemented to mitigate risks.

During the reporting period, no incidents of child labor, forced or compulsory labor, or other significant negative social impacts within the supply chain were identified. Regular audits, self-assessment questionnaires, and ongoing dialogue with suppliers ensure systematic monitoring and follow-up.

#### Supplier Certification and Sustainability Evaluation

Suppliers with certifications or sustainability assessments from platforms such as TfS (Together for Sustainability) via EcoVadis, or certifications like SA 8000, ISO 14001, ISO 45001, and GMP+, are given due consideration during supplier evaluations.

New suppliers also complete a comprehensive questionnaire based on the 10 Principles of the UN Global Compact and the Fundamental Principles of Occupational Health and Safety outlined by the International Labour Organization (ILO). These responses are evaluated by the responsible Product Manager.

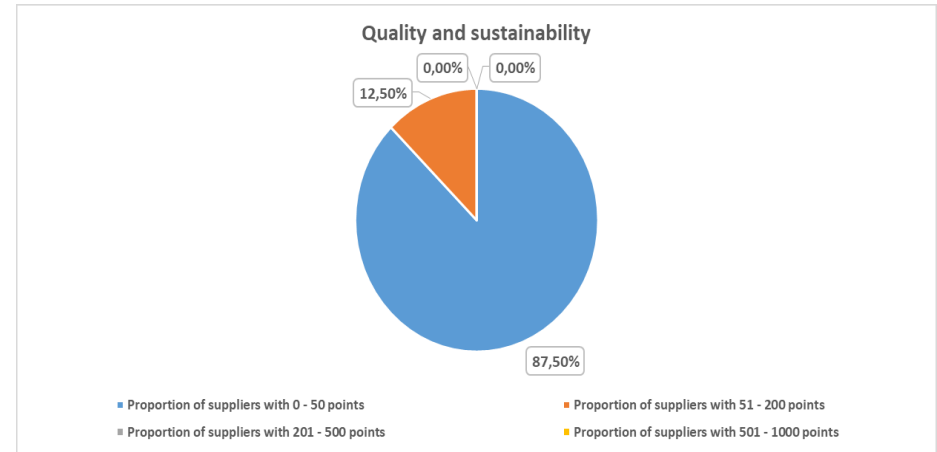


Figure 13: Risk assessment - Quality and sustainability

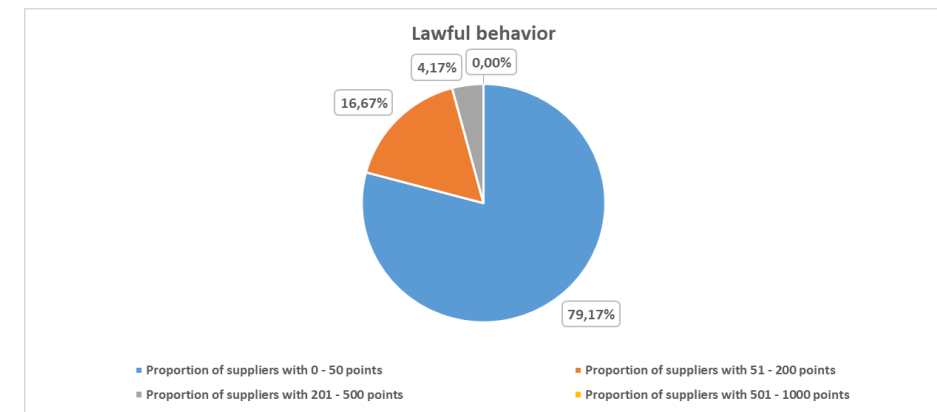


Figure 14: Risk assessment - Lawful behavior

## Code of Conduct

As part of the Questionnaire Sustainability sent to all Tier-A suppliers, suppliers were asked to confirm their adherence to TROPAG's Code of Conduct or provide a link to their own code of conduct, if applicable. These responses were reviewed on a sample basis, and no negative deviations from TROPAG's standards were identified. This outcome reaffirms the effectiveness of TROPAG's long-standing supplier policy, which emphasizes ethical collaboration.

TROPAG exclusively partners with suppliers who meet high standards in quality, environmental protection, safety, and social responsibility. During the annual Management Review, the relevance and alignment of TROPAG's Code of Conduct were reaffirmed, underscoring the company's ongoing commitment to maintaining a responsible and sustainable supply chain.

- Approximately 70% of responding A-level suppliers have confirmed adherence to TROPAG's Code of Conduct, while the remaining 30% provided their own equivalent Codes of Conduct. As a result, 100% of responding A-level suppliers operate under a formal Code of Conduct framework.
- 89% of A-level suppliers hold ISO 9001 certification.
- 63% are certified to ISO 14001, and 15% have achieved or plan to achieve OHSAS 18001 certification.
- 7% of A-level suppliers are ISO 50001 certified.

Suppliers with unclear responses or identified deficiencies are engaged in further discussions, and corrective measures are jointly developed as necessary. During the reporting period, no supplier had to be excluded due to insufficient compliance.

## Annual Supplier Visits and Self-Audits

Key (A-level) suppliers are visited annually by a Product Manager, who performs audits using a standardized checklist. This checklist is identical to that used for self-audits completed by customers. The Product Manager reviews the documentation provided by suppliers to verify the effectiveness of their compliance measures.

Since 2020, all A-level suppliers, along with selected B- and C-level suppliers, have been requested to conduct self-audits using the **Questionnaire Sustainability**. Personal engagement and follow-ups have resulted in a strong response rate of 84%.

The results of the self-audit evaluations were highly satisfactory:

- All responding suppliers achieved a score of 85% or higher.
- **40% scored between 90% and 99%**, and approximately one-third achieved a perfect score of 100%.

These results highlight the strong alignment of TROPAG's suppliers with our sustainability and quality standards.

In addition to internal audits, TROPAG collaborates with external auditing firms, ensuring robust and independent verification of supplier practices, where necessary.

The systematic alignment of supplier policies with TROPAG's sustainability goals demonstrates the company's focus on ethical sourcing and supply chain integrity. TROPAG remains committed to fostering long-term partnerships with suppliers that uphold the principles of sustainable development and responsible business practices.

This proactive approach ensures compliance with both internal standards and external regulations while reinforcing TROPAG's reputation as a reliable and ethical organization in global markets.

## 4.2 Transport and Logistics

GRI 308-1 | GRI 414-1 | GRI 416-1 | GRI 416-2

TROPAG does not maintain in-house logistics infrastructure, but relies exclusively on certified and continuously monitored logistics providers for the transportation, handling, and storage of goods. Among the contracted logistics providers, 56% are certified to ISO 9001, 17% hold ISO 14001 certification, and 17% are Authorized Economic Operators for Full Security (AEOF).

Two certified Dangerous Goods Officers at TROPAG provide training and consultation to employees on the safe and legally compliant transport and handling of hazardous materials. This training is a mandatory part of the onboarding process for new employees. An annual report is prepared that analyzes transported quantities by hazard class and documents any incidents or near misses. No incidents involving hazardous goods were reported during the reporting period. TROPAG regularly provides its logistics providers and suppliers with information on relevant European and international hazardous goods regulations, underlining the importance of compliance and safety. To ensure proper loading and transport safety, especially for critical products, suppliers and logistics providers are required to document loading and unloading procedures with photos or videos. This allows for real-time intervention in case of deviations and minimizes the risk of errors. By integrating supplier audits, risk assessments, and preventive measures, TROPAG ensures a sustainable and transparent supply chain that aligns with international standards and supports long-term partnerships.

During the reporting period, there were no reported errors in the preparation of documents or in the transportation process by contracted carriers, demonstrating the effectiveness of TROPAG's strict quality and safety protocols in logistics management.

Environmental impacts related to transportation, such as greenhouse gas emissions, are currently not measured or reported within this section. Reporting on transport-related emissions is provided in the separate Scope 3 emissions section of this report.

## 4.3 Product Safety, Labelling, Compliance, and Continuous Improvement

GRI 416-1 | GRI 416-2 | GRI 417-1 | GRI 2-24

### 4.3.1 Management Approach and Legal Compliance

GRI 3-3 | GRI 2-24 | GRI 417-2 | GRI 417-3

The management approach for product safety, labelling and compliance is continuously overseen by the responsible compliance officer and the quality management team. Responsibilities are clearly defined, and implementation is ensured through documented procedures and ongoing monitoring. Feedback mechanisms allow employees and business partners to report potential risks or incidents, which are promptly investigated and addressed. Annual reviews at management level assess the effectiveness of the management approach and drive improvements.

We ensure that all products traded by our company are clearly and comprehensively labelled and are accompanied by all legally required documents, including up-to-date Material Safety Data Sheets (MSDS). Our activities are fully compliant with:

- REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals)
- CLP (Classification, Labelling and Packaging)
- Other relevant European and international regulatory frameworks

The preparation and maintenance of all MSDS is managed in close cooperation with a specialized external service provider, ensuring ongoing accuracy and compliance with all regulations. In 2024, more than 600 MSDS were registered, maintained, and actively provided to our customers. Our objective is to achieve and sustain 100% coverage for all customers with valid MSDS for every chemical substance and admixture traded. This target was fully met in 2024, and no complaints or incidents related to missing or outdated MSDS were recorded.

No incidents of non-compliance regarding product safety or labelling were reported during the review period. Nevertheless, we maintain a well-structured and transparent system for incident reporting and root cause analysis, enabling prompt response in the event of any identified risk to product integrity or customer safety.

To drive continuous improvement, we pursue the following measures:

- Regular internal audits to evaluate and enhance safety and quality procedures
- Ongoing training and awareness programs for all employees on product safety and regulatory compliance
- Cooperation with independent certification bodies for annual compliance audits and recertification

Lessons learned from audits, trainings, and potential incident reports are systematically reviewed and incorporated into our management system to uphold the highest standards in product safety, labelling, and compliance.

Note: Marketing communication and promotional materials are not considered material topics for our business operations. Therefore, GRI 417-3 (incidents of non-compliance concerning marketing communications) is not considered relevant for our sustainability reporting.

### 4.3.2 GMP+ and HACCP Integrated Feed Safety Management

GRI 416-1 | GRI 2-24

TROPAG collaborates closely with the Hamburg Authority for Justice and Consumer Protection to ensure a high level of health protection for both animals and humans. Feed monitoring at TROPAG is conducted in strict adherence to European and national regulations, building the foundation for our commitment to consumer safety.

As a global trader and distributor of agrochemicals and trace elements for the feed industry, we prioritize product safety across the entire value chain. Our integrated management systems and third-party certifications are central to safeguarding both the end consumer and our business partners.

TROPAG holds certification under the GMP+ Feed Safety Assurance Module 2020—a key element of our product safety and quality management strategy. This internationally recognized certification ensures:

- Strict compliance with feed safety regulations, reducing contamination risks and ensuring complete traceability
- Systematic supplier evaluation and qualified sourcing, allowing only compliant and approved materials into the supply chain
- Alignment with EU regulatory frameworks, including the EU Feed Hygiene Regulation
- A verified chain of custody, enabling rapid tracking and recall if necessary

TROPAG's responsible sourcing is supported by the implementation of a robust HACCP-based feed safety system.

Trained internal HACCP teams regularly review:

- Biological, chemical, and physical hazards associated with products
- Control points and corrective actions
- Risk mitigation strategies

This system is reviewed and updated annually or as required, based on regulatory, scientific, or market-related developments, ensuring continuous improvement and ongoing legal compliance.

## 4.4 TROPAG's Role in Beryllium Stewardship

GRI 416-1 | GRI 403-1 | GRI 403-2

As one of Europe's leading distributors of beryllium—whether as a pure substance, in articles, or in preparations such as alloys—TROPAG recognizes its responsibility to ensure the safe handling and use of this critical material. With its wide applications in advanced technologies, beryllium is indispensable in industries ranging from aerospace to electronics. However, its use comes with unique challenges, particularly regarding workplace safety.

### 4.4.1 The "Be Responsible" Program<sup>10</sup>

One of the key safety challenges associated with beryllium is the potential risk of chronic beryllium disease (CBD), a rare but serious lung condition that may develop in sensitized individuals exposed to beryllium dust or fumes in the workplace (and only there). To address this risk, TROPAG, in partnership with other BeST members, developed a voluntary occupational safety program known as the "Be Responsible" Product Stewardship Program<sup>11</sup>.

This program provides comprehensive guidance and resources to ensure the safe use of beryllium across its lifecycle. Key components include:

- Awareness and Training: Resources for employers and employees to understand beryllium's risks and how to mitigate them.
- Safety Procedures: Detailed recommendations for handling, processing, and disposing of beryllium to minimize exposure risks.
- Monitoring and Support: Guidelines for workplace monitoring, medical surveillance, and exposure controls.

The program is freely accessible on the website (<http://www.berylliumsafety.eu>), providing valuable information to regulators, employers, workers, and consultants alike. By sharing this knowledge openly, TROPAG and BeST empower all stakeholders to create safer workplaces and ensure regulatory compliance.

### 4.4.2 Communicating with Stakeholders

TROPAG ensures that its customers are well-informed about beryllium safety. Information about the "Be Responsible" program is prominently featured on the company's website and communicated directly to clients. This proactive approach reflects TROPAG's belief that transparency and collaboration are essential to maintaining trust and fostering responsible use of beryllium.

For TROPAG, sustainability is not only about environmental stewardship but also about ensuring the well-being of those involved in the supply chain. By prioritizing occupational safety and contributing to the global knowledge base on beryllium, TROPAG demonstrates how industry leadership can drive meaningful progress toward sustainable practices.

The "Be Responsible" program exemplifies this commitment, providing a framework for safe beryllium use that protects workers, supports innovation, and upholds the highest standards of responsibility. Through its partnership with BeST and the EU OSHA initiative, TROPAG continues to set a benchmark for safety and sustainability in the beryllium industry.

<sup>10</sup> <https://www.berylliumsafety.eu/about-us>

<sup>11</sup> Beryllium Science & Technology Association, Rue Belliard 205, 1040 Brussels

## 4.5 Circular Economy

GRI 301-1 | GRI 301-2 | GRI 301-3

As a trading company, we exclusively supply raw and semi-finished materials to our customers for further processing. We do not manufacture end products ourselves. Consequently, we do not possess information regarding the recycling or reuse of the materials we sell, as these processes are managed by our customers and their downstream value chains. Therefore, it is not possible for us to report on the recycled input materials according to GRI 301-2.

However, TROPAG supports the advancement of the circular economy by distributing materials produced with recycled inputs, pre-consumer resources, and industrial by-products. While we are not a manufacturer ourselves, our role in selecting and promoting responsibly sourced materials has a direct influence on resource conservation and waste minimization across the supply chain.

### 4.5.1 Circular Input Trends and 2024 Performance

In 2024, TROPAG distributed roughly 9,000mt of different materials, globally. 53.6% of the products contained recycled or upcycled material, causing a slight decrease to 2023, however demonstrating a significant improvement from earlier years, when recycled content remained below 38%. At the same time, primary raw material use rose slightly to 46.4%, showing a minimal increase to 2023, yet is still reflecting a clear pivot toward sustainable sourcing when looking over the last years.

Material Composition Breakdown – 2024 vs Previous Years:

- From 2019 to 2022, circular content grew modestly from 31.9% to 37.9%, while the share of primary raw materials declined from 68.1% to 62.1%
- In 2023 primary input use decreased massively compared to previous years, while by-products accounted for 36.3% and pre-consumer scrap for 8.1%.
- In 2024 the share of primary raw materials remained steady at around 46%. Simultaneously the use of pre-consumer scrap decreased by 10% compared to 2023, resulting in a vast increase for by-products from 36,3% to 45,5%.

This confirms a broader shift in material origin, where non-primary resources now make up 53,6% of TROPAG's distributed portfolio.

### 4.5.2 Material Classifications and Sourcing Approach

Based on a refined evaluation of supplier practices, we classify our raw material origins as follows:

- **Primary:** Materials sourced directly from natural resources, such as minerals, ores, or agricultural products, that have not been previously used or processed. These materials are extracted or harvested for the first time for use in manufacturing, representing the initial input to the value chain before any recycling or reuse occurs.
- **Pre-Consumer Scrap (New Scrap):** Off-spec or excess material from industrial processes, recovered and reused before reaching the end-user. A key contributor to our circular share.
- **Industrial By-Products:** Co-products generated intentionally through efficient production design. Rather than being discarded, these materials are either used directly or further processed to enhance value. Their use reflects a deliberate strategy by our suppliers to minimize waste and extend the industrial value chain.
- **Post-Consumer Scrap:** Not currently applicable—our suppliers have confirmed that no post-consumer recycled materials are present in our product offerings.
- **Home Scrap:** As a non-manufacturing company, TROPAG does not generate internal production scrap.

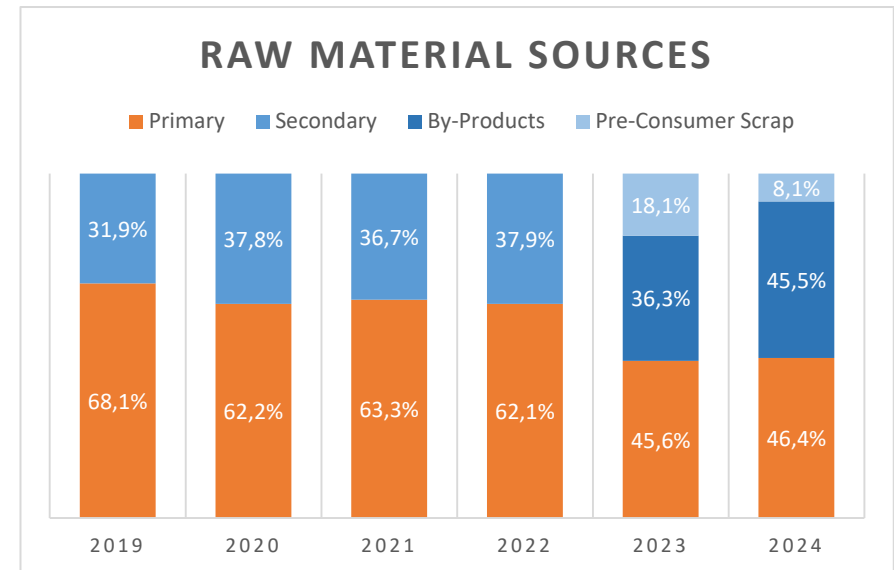


Figure 15: Products with recycled / upcycled content

### 4.5.3 Sustainable Packaging Practices at TROPAG

Chemicals often require careful handling due to their sensitive nature, with some classified as hazardous materials or substances. These must be securely packaged to ensure safety and compliance with strict legal regulations. Conversely, other materials are relatively harmless and straightforward, allowing for transport and storage in environmentally friendly bulk packaging. This approach not only reduces costs but also minimizes packaging material use, contributing to environmental conservation.

For hazardous materials, packaging is subject to stringent legal requirements, leaving little room for innovation in reducing packaging materials. However, wherever technically and environmentally feasible, we offer customers the option to receive goods in alternative packaging formats, such as:

- Loose, unpackaged deliveries via silo or tank vehicles,
- Bulk containers, such as Big Bags or intermediate bulk containers (IBCs),
- Steel drums, being either multi-usable or easy to recycle,
- Paper based sack packaging, which significantly reduces the use of plastic packaging,
- Cardboard based packaging such as drums and boxes, which also significantly reduce the use of plastic packaging,
- Wooden boxes, especially when shipping metals

Intermediate bulk containers (IBCs) produced by Schütz are usually included in the Schütz company's own take-back program. Under this program, many of our customers can return used Schütz IBCs free of charge in accordance with the conditions published by Schütz. The program ensures that used containers are collected, processed, and, where possible, recycled or properly managed in an environmentally sound manner.

During the reporting period, 94% of the goods we sold were delivered using reduced packaging solutions. These deliveries comprised:

- 17% loose goods, entirely without secondary packaging. This share is consistent within usual fluctuations. (2023 - 23%, 2022 - 18%)
- 46% in Big Bags, i.e. bulk containers for solids (2023 – 48%, 2022 – 41%)
- 5% in IBCs, intermediate bulk containers for liquids (2023 – 3%, 2022 – 3%)
- 24% in paper sacks (2023 – 17%, 2022 – 32%)
- 1 % in steel drums
- 1% in wooden boxes

These figures reflect our ongoing commitment to optimizing packaging practices, reducing environmental impact, and supporting sustainable logistics solutions.

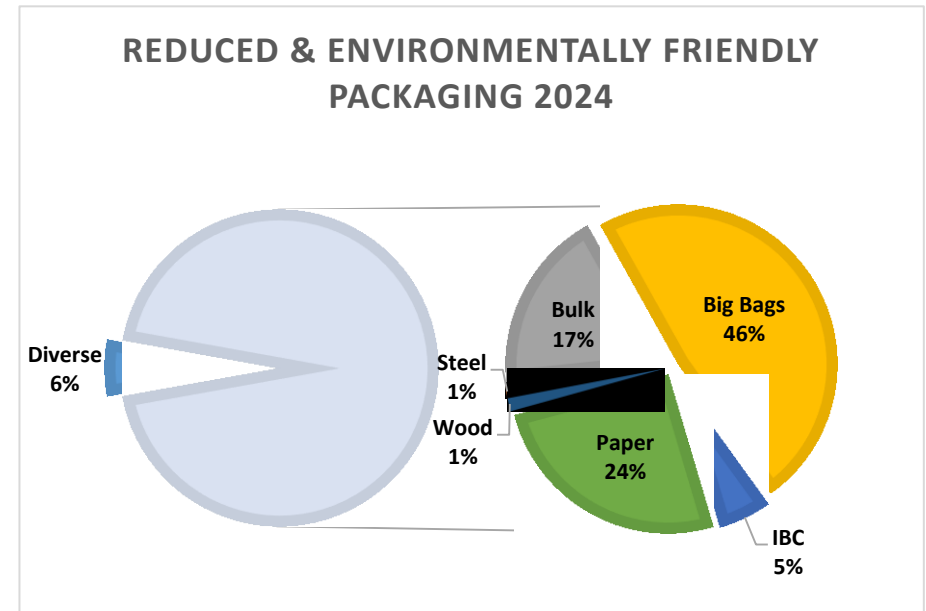


Figure 16: Reduced and environmentally friendly packaging

## 5 Note on Methodology

GRI 2-4 | GRI 2-5

This sustainability report is prepared in accordance with the GRI Standards, with a strong commitment to transparency, relevance, and accuracy. The reporting practices described below outline the methodological framework, transformation process, and key considerations applied in the preparation of this report. No external assurance has been conducted for this sustainability report. The information and data presented have not been audited or verified by an independent third party.

### 1. Ongoing Transformation Toward Full GRI Alignment

TROPAG Oscar H. Ritter Nachf. GmbH is currently in the process of transforming its sustainability reporting practices to fully align with the latest GRI Index standards. This transformation is an ongoing, multi-year project aimed at enhancing the comprehensiveness and comparability of disclosed information.

Some chapters and disclosure requirements are still being developed and will be included in future reporting cycles.

The report is prepared to the best of our knowledge and based on the most reliable and up-to-date information that is available at the time of publication.

### 2. Data Collection and Quality

Data for this report is gathered from internal records, subject matter experts, and relevant operational and management systems within the reporting entities.

Where quantitative data was not available, qualitative explanations and narrative descriptions have been provided in accordance with GRI recommendations.

### 3. Confidentiality and Data Protection

In certain cases, specific data and detailed information are classified as confidential due to commercial sensitivity and/or protected under country-specific data protection regulations. Such confidential information is withheld or presented in aggregate form, in full compliance with legal requirements and with respect for the interests of all stakeholders.

### 4. Reporting Scope and Limitations

The content of this report covers TROPAG Oscar H. Ritter Nachf. GmbH and its 100% subsidiary Tropag France SARL, as indicated in the reporting scope section (GRI 2-1 and 2-2).

Topics, indicators, and figures are presented as comprehensively as possible, but limitations may result from evolving measurement systems, data availability, and the ongoing process of incorporating new GRI requirements. Where information is not available or not applicable, this has been clearly indicated in the relevant sections of the report.

### 5. Continuous Improvement

TROPAG is committed to continuously improving its sustainability reporting process. Feedback from stakeholders and advances in reporting standards are integral to this ongoing development.

### 6. Contact and Further Information

For questions regarding the reporting methodology or for further information, please refer to the contact details provided.

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## 6 GRI-Index

<b>Statement of use</b>	TROPAG Oscar H. Ritter Nachf. GmbH has reported in accordance with the GRI Standards for the period 01.01.2024 – 31.12.2024.
<b>Used GRI 1</b>	GR1: Foundation 2021

<b>GRI-standard and its description</b>	<b>Pages</b>	<b>Comments and online additions</b>
<b>GRI 2: General Disclosures 2021</b>		
<b>The organization and its reporting practices</b>		
2-1 Organizational details	5, 22	
2-2 Entities included in the organization's sustainability reporting	5	
2-3 Reporting period, frequency and contact point	5	Contact: info@tropag.com
2-4 Restatements of information	n/a	None
2-5 External assurance	n/a	None
<b>Activities and workers</b>		
2-6 Activities, value chain and other business relationships	5	
2-7 Employees	26	
2-8 Workers who are not employees	n/a	None
<b>Governance</b>		
2-9 Governance structure and composition	5	Not reported
2-10 Nomination and selection of the highest governance body	5	Not reported
2-11 Chair of the highest governance body	5	
2-12 Role of the highest governance body in overseeing the management of impacts	5	Not reported
2-13 Delegation of responsibility for managing impacts	5	Not reported
2-14 Role of the highest governance body in sustainability reporting	5	Not reported
2-15 Conflicts of interest	5	Not reported
2-16 Communication of critical concerns	5	Not reported
2-17 Collective knowledge of the highest governance body	5	Not reported
2-18 Evaluation of the performance of the highest governance body	5	Not reported
2-19 Remuneration policies	5	Not reported
2-20 Process to determine remuneration	5	Not reported
2-21 Annual total compensation ratio	5	Not reported
<b>Strategy, policies and practices</b>		
2-22 Statement on sustainable development strategy	6,10	
2-23 Policy commitments	6,10	
2-24 Embedding policy commitments	6	
2-25 Processes to remediate negative impacts	n/a	
2-26 Mechanisms for seeking advice and raising concerns	36	
2-27 Compliance with laws and regulations	8	
2-28 Membership associations	23	
<b>Stakeholder engagement</b>		

2-29 Approach to stakeholder engagement		Not reported
2-30 Collective bargaining agreements	n/a	
<b>GRI 3: Material Topics 2021</b>		
3-1 Process to determine material topics		
3-2 List of material topics		
<b>GRI 201: Economic Performance 2016</b>		
3-3 Management of material topics	5	Not reported
201-1 Direct economic value generated and distributed	5	Not reported
201-2 Financial implications and other risks and opportunities due to climate change	5	Not reported
201-3 Defined benefit plan obligations and other retirement plans	5	Not reported
201-4 Financial assistance received from government	5	Not reported
<b>GRI 202: Market Presence 2016</b>		
3-3 Management of material topics	5	
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	n/a	No material topic
202-2 Proportion of senior management hired from the local community	26	
<b>GRI 203: Indirect Economic Impacts 2016</b>		
3-3 Management of material topics	5	No material topic
203-1 Infrastructure investments and services supported	n/a	
203-2 Significant indirect economic impacts	n/a	
<b>GRI 204: Procurement Practices 2016</b>		
3-3 Management of material topics	5	
204-1 Proportion of spending on local suppliers	n/a	No material topic
<b>GRI 205: Anti-corruption 2016</b>		
3-3 Management of material topics		
205-1 Operations assessed for risks related to corruption	n/a	No material topic
205-2 Communication and training about anti-corruption policies and procedures	31	
205-3 Confirmed incidents of corruption and actions taken	35	
<b>GRI 206: Anti-competitive Behavior 2016</b>		
3-3 Management of material topics		
206-1 Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	35	None
<b>GRI 207: Tax 2019</b>		
3-3 Management of material topics	5	
207-1 Approach to tax	5	Not reported
207-2 Tax governance, control, and risk management	5	Not reported
207-3 Stakeholder engagement and management of concerns related to tax	5	Not reported
207-4 Country-by-country reporting	5	Not reported
<b>GRI 301: Materials 2016</b>		
3-3 Management of material topics	46	
301-1 Materials used by weight or volume	46	
301-2 Recycled input materials used	46	

**GRI 302: Energy 2016**

3-3 Management of material topics	10	
302-1 Energy consumption within the organization	10, 11	
302-2 Energy consumption outside of the organization	13	
302-3 Energy intensity	10, 11, 17	
302-4 Reduction of energy consumption	10, 11, 17	
302-5 Reductions in energy requirements of products and services	14	No information available

**GRI 303: Water and Effluents 2018**

3-3 Management of material topics	21	
303-1 Interactions with water as a shared resource	21	
303-2 Management of water discharge-related impacts	21	
303-3 Water withdrawal	21	
303-4 Water discharge	21	
303-5 Water consumption	21	

**GRI 304: Biodiversity 2016**

3-3 Management of material topics	5	No material topic
304-1 Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	n/a	
304-2 Significant impacts of activities, products and services on biodiversity	n/a	
304-3 Habitats protected or restored	n/a	
304-4 IUCN Red List species and national conservation list species with habitats in areas affected by operations	n/a	

**GRI 305: Emissions 2016**

3-3 Management of material topics	10	
305-1 Direct (Scope 1) GHG emissions	10	
305-2 Energy indirect (Scope 2) GHG emissions	11	
305-3 Other indirect (Scope 3) GHG emissions	13	
305-4 GHG emissions intensity	10, 11, 13	
305-5 Reduction of GHG emissions	10, 11, 13	
305-6 Emissions of ozone-depleting substances (ODS)	n/a	
305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	n/a	

**GRI 306: Waste 2020**

3-3 Management of material topics	15	
306-1 Waste generation and significant waste-related impacts	15	
306-2 Management of significant waste-related impacts	15	
306-3 Waste generated	15	
306-4 Waste diverted from disposal	15	
306-5 Waste directed to disposal	15	

**GRI 308: Supplier Environmental Assessment 2016**

3-3 Management of material topics	40	
308-1 New suppliers that were screened using environmental criteria	40	

308-2 Negative environmental impacts in the supply chain and actions taken	40	
<b>GRI 401: Employment 2016</b>		
3-3 Management of material topics		
401-1 New employee hires and employee turnover	26	
401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees	n/a	None
401-3 Parental leave	n/a	No parental leave in 2024
<b>GRI 402: Labor/Management Relations 2016</b>		
3-3 Management of material topics		
402-1 Minimum notice periods regarding operational changes	n/a	No material topic
<b>GRI 403: Occupational Health and Safety 2018</b>		
3-3 Management of material topics		
403-1 Occupational health and safety management system	27	
403-2 Hazard identification, risk assessment, and incident investigation	27	
403-3 Occupational health services	27	
403-4 Worker participation, consultation, and communication on occupational health and safety	27	
403-5 Worker training on occupational health and safety	30	
403-6 Promotion of worker health	27	
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	n/a	No material topic
403-8 Workers covered by an occupational health and safety management system	27	
403-9 Work-related injuries	27	
403-10 Work-related ill health	27	
<b>GRI 404: Training and Education 2016</b>		
3-3 Management of material topics		
404-1 Average hours of training per year per employee	29	
404-2 Programs for upgrading employee skills and transition assistance programs	28	
404-3 Percentage of employees receiving regular performance and career development reviews	29	
<b>GRI 405: Diversity and Equal Opportunity 2016</b>		
3-3 Management of material topics		
405-1 Diversity of governance bodies and employees	32	
405-2 Ratio of basic salary and remuneration of women to men	32	
<b>GRI 406: Non-discrimination 2016</b>		
3-3 Management of material topics		
406-1 Incidents of discrimination and corrective actions taken	32	
<b>GRI 407: Freedom of Association and Collective Bargaining 2016</b>		
3-3 Management of material topics		
407-1 Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	40	
<b>GRI 408: Child Labor 2016</b>		
3-3 Management of material topics		
408-1 Operations and suppliers at significant risk for incidents of child labor	40	
<b>GRI 409: Forced or Compulsory Labor 2016</b>		

3-3 Management of material topics	40	
409-1 Operations and suppliers at significant risk for incidents of forced or compulsory labor	40	
<b>GRI 410: Security Practices 2016</b>		
3-3 Management of material topics		No security personell employed
410-1 Security personnel trained in human rights policies or procedures	n/a	
<b>GRI 411: Rights of Indigenous Peoples 2016</b>		
3-3 Management of material topics		No material topic in Germany
411-1 Incidents of violations involving rights of indigenous peoples	n/a	
<b>GRI 412: Human Rights Assessment</b>		
3-3 Management of material topics		
412-1 Operations that have been subject to human rights reviews or impact assessments	40	
412-2 Employee training on human rights policies or procedures	28	
412-3 Signifcant investment agreements and contracts that include human rights clauses or that underwent human rights screening	n/a	None
<b>GRI 413: Local Communities 2016</b>		
3-3 Management of material topics		No material topic (only office facilities)
413-1 Operations with local community engagement, impact assessments, and development programs	n/a	None
413-2 Operations with significant actual and potential negative impacts on local communities	n/a	None
<b>GRI 414: Supplier Social Assessment 2016</b>		
3-3 Management of material topics	40	
414-1 New suppliers that were screened using social criteria	40	
414-2 Negative social impacts in the supply chain and actions taken	40	
<b>GRI 415 Political contributions</b>		
415-1 Political contributions	n/a	
<b>GRI 416: Customer Health and Safety 2016</b>		
3-3 Management of material topics		
416-1 Assessment of the health and safety impacts of product and service categories	43, 44	
416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	43, 44	
<b>GRI 417: Marketing and Labeling 2016</b>		
3-3 Management of material topics		
417-1 Requirements for product and service information and labeling	43	GHS / CLP / MSDS
417-2 Incidents of non-compliance concerning product and service information and labeling	43	
417-3 Incidents of non-compliance concerning marketing communications	43	
<b>GRI 418: Customer Privacy 2016</b>		
3-3 Management of material topics	37	
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	37	