

A female scientist with blue hair, wearing a white lab coat and a white hairnet, is holding a multi-well plate with both hands. She is looking up at the plate with a focused expression. The background is a laboratory with glass partitions and bright overhead lights.

croma

Embracing Responsibility –
Committed to Safety and Quality
Sustainability Report 2024



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Foreword by the Executive Board

The year 2024 was characterised by focussing on and strengthening our corporate base. Due to a very challenging economic environment, we have taken extensive measures to improve our economic fundamentals and, above all, our cost structure. This required a comprehensive restructuring process, which was very challenging but has already had an effect: We were able to increase our sales and also improve our earnings situation through consistent cost optimisation.

The entry of Argus Vermögensverwaltungs GmbH & Co KG was an important step in the strategic development of our company. Our new co-owner, who has held a third of Croma's shares since August 2024, contributes to the financial stability of our company and provides new impetus for our growth. The reorganisation of our management team and the Supervisory Board brings fresh perspectives to our company.

With saypha® RICH, we are now the first company worldwide to hold a dermal filler that meets the strict requirements of the EU Medical Devices Regulation (MDR) and our entire filler program is now approved by MDR since the end of 2024. This MDR approval stands for the highest product quality, patient safety and efficiency and marks a decisive step in our global growth strategy. At the same time, the successful completion of our first FDA (U.S. Food and Drug Administration) inspection was another significant milestone. This inspection paves the way for two of our innovative medical products on the US market and emphasises our high commitment to the highest regulatory standards.

We are also particularly proud of our achievements in the area of sustainability. The strategic foundation laid last year is already having a significant impact. We have successfully anchored sustainability in the operational basis and process landscape of our company. The ESG Transparency Award for our Sustainability Report 2023 as well as the silver medal in the EcoVadis rating impressively confirm the path we have already taken. We have further consolidated our environmental management system with the successful ISO 14001 certification and monitoring audit. At the same time, we laid the foundation for company-wide corporate risk management with the introduction of ISO 31000.

Our extended purpose 'It's a matter of treatment -embracing responsibility for a tomorrow worth living in' remains the compass for our actions. With this in mind, we have also reorganised our company-wide ideas workshop to promote innovations that contribute to cost savings and the achievement of our sustainability targets.

We would like to thank all our stakeholders – business partners and our dedicated employees - for their trust and support during this year of reorganisation. Together, we are shaping a successful and sustainable future for Croma-Pharma.

Leobendorf, 14 May 2025

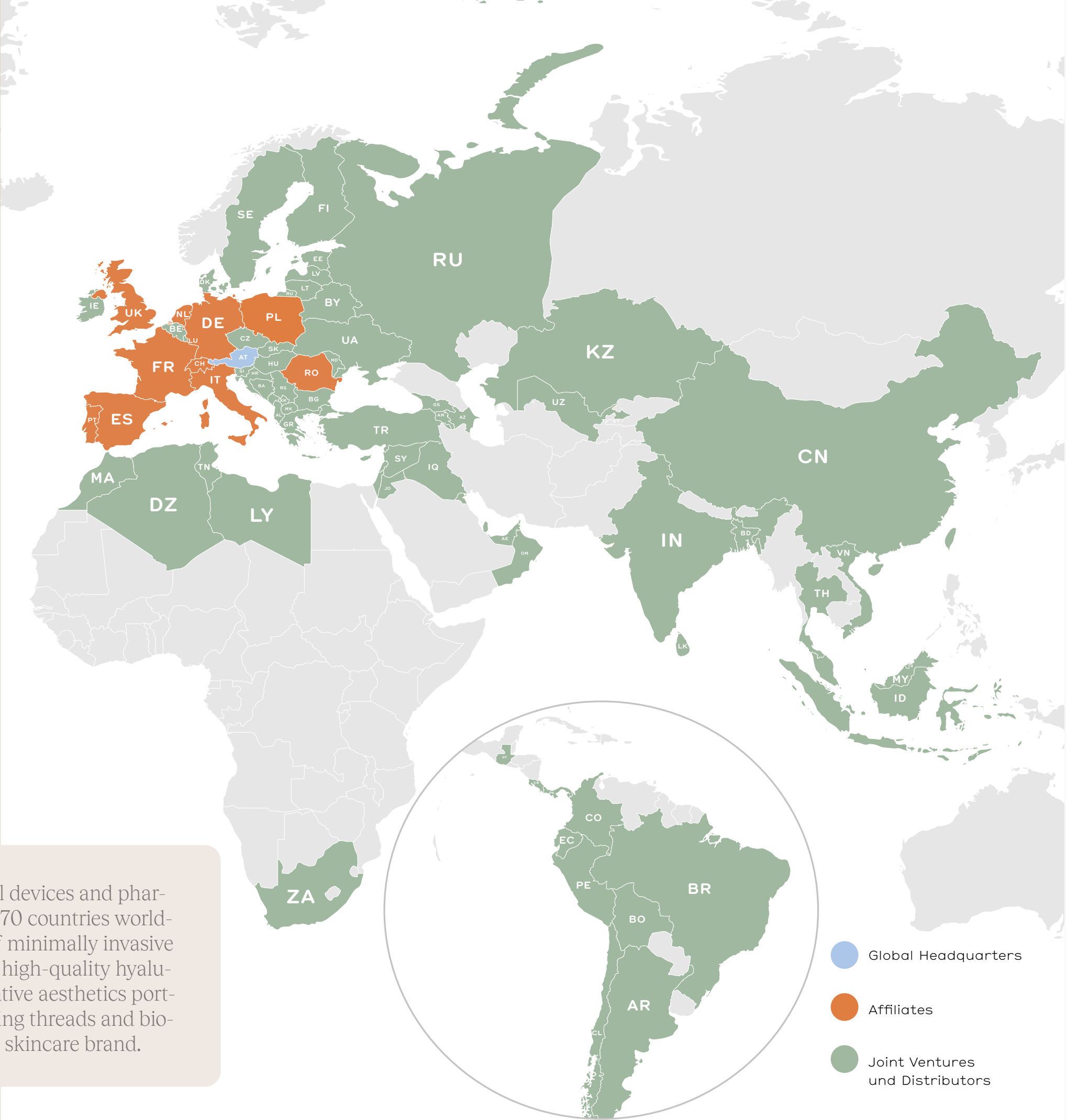


Andreas Prinz, CEO

Peter Haidenek, CFO

Croma at a glance

Croma is a highly specialised company for medical devices and pharmaceutical products, supplying customers in over 70 countries worldwide. The company is a global player in the field of minimally invasive aesthetic medicine and a leading manufacturer of high-quality hyaluronic acid injections. The wide-ranging and innovative aesthetics portfolio includes botulinum toxin as well as fillers, lifting threads and bio-stimulators, complemented by the company's own skincare brand.



Performance highlights

ESG Transparency Award



With an overall score of 87%, Croma is in the excellence class.



EcoVadis
Silver medal

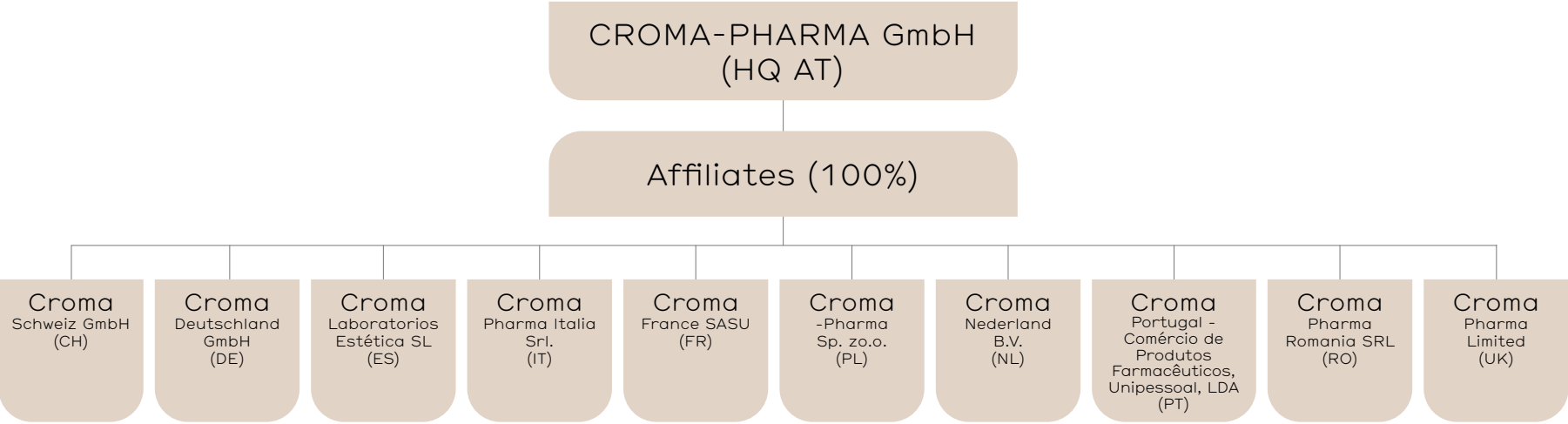


FDA Premarket
Application



Croma is the first company in the world to achieve MDR approval in the aesthetic sector.

Organisational structure



Employees 2024	Total	AT	CH	DE	ES	FR	IT	NL	PL	PT	RO	UK
Number of employees	479	373	2	17	20	11	7	4	20	2	9	14
Full-time equivalents	448.9	349.5	1.8	14.1	19	11	7	3.7	20	2	7	13.8

Employees 2023*		Total	Employees 2022*		Total
Number of employees		600	Number of employees		568
Full-time equivalents		387.5	Full-time equivalents		393.5

Number of employees (active workers, salaried employees and apprentices): as at 31 December.
* In the period 2022/2023, the data standardisation process had not yet been implemented in the affiliates.

Locations	2022	2023	2024
Locations (incl. affiliates)	12	12	11
Production sites	2	1	1

In 2022, the old production facility was still in operation at the Leobendorf site alongside the new one.

The company’s corporate bodies are divided into the Executive Board and the Supervisory Board. The members of the Executive Board in the reporting period were

- Andreas Prinz (CEO)
- Peter Haidenek (CFO)
- Gerhard Prinz (until 20 August 2024)
- Martin Prinz (until 20 August 2024)

The Supervisory Board consists of the following persons:

- Johanna Piffl-Percevic, chairwoman (from 20 August 2024)
- Martin Prinz, deputy (from 20 August 2024)
- Bernhard Klemen, member (from 20 August 2024)
- Sebastian Semlitsch, member (from 20 August 2024)
- Hannes Reisenhofer (from 06 March 2024 to 20 August 2024)
- Stefan Schmuckenschlager (until 20 August 2024)
- Jürgen Kittel (until 20 August 2024)

As a family business, Croma committed itself to a sustainable corporate policy many years ago and is dedicated to acting responsibly towards society and the environment. A shared mission statement with specific corporate values provides employees with a clear framework for action and orientation for respectful, efficient and fair cooperation.

Our purpose

As a responsible company, sustainability is not only deeply rooted in Croma’s own corporate culture, but also plays a key role in its collaboration with its stakeholders. In its business activities, Croma attaches great importance to treating people and the environment with care. The company’s sustainability-specific guiding principle is: "It’s a matter of treatment - embracing responsibility for a tomorrow worth living in". All of Croma’s corporate processes are guided by this principle. It is intended not only to promote employee motivation, but also to give work a deeper meaning. This is because Croma not only strives for long-term economic success, but also acts in the interests of the common good.

Our values

Quality, structure, commitment

Focus on results and solutions, duty of care, personal responsibility

Appreciation, openness, fairness

Curiosity, willingness to learn and to change

Sustainability, foresight, joy

reliability

accomplishment

open mindedness

cooperation

meaning

General disclosures

General disclosures | ESRS 2

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As a leading manufacturer of hyaluronic acid injections, Croma relies on state-of-the-art production processes and guarantees the highest quality and safety standards. In this context, the MDR re-approval of the entire product group represents a significant milestone for the company. In order to continue meeting the needs of its stakeholders in the future, Croma invests in research and development and is committed to sustainable and innovative solutions to protect the environment and to promote fair working conditions and business practices.

Croma at a glance

General disclosures

Environment

Social

Business conduct

Additional information

General disclosures

Basis for preparation

BP-1 General basis for preparation of the sustainability statements

This Sustainability Report was prepared on an individual and voluntary basis and relates both to the company’s core processes and to the upstream and downstream value chain of the headquarters in Austria, 2100 Leobendorf. The European affiliates were not included in the presentation of sustainability-specific KPIs, as the employees mainly work in sales (see table employees p. 5) and the majority of employees are based in Austria, where the only production facility is located. There are no omissions of information in connection with intellectual property or innovations and data points.

BP-2 Disclosures in relation to specific circumstances

Since 2024, Croma has published an annual sustainability report covering all business activities from 1 January to 31 December. The report is based exclusively on the European Sustainability Reporting Standards (ESRS). The UN Sustainable Development Goals were considered when developing the targets. A detailed overview of the standards and the relevant EU data points, including page references, can be found from p. 15.

Regarding the definition of time horizons, a period of one year is used for short-term perspectives, two to five years for medium-term perspectives and more than six years for long-term perspectives. In the case of data from the upstream or downstream value chain, e.g. for the analysis of Scope 3 emissions, internationally recognised emission factors or comparative data from international databases and emission data from transport service providers were used.

To assess water risk, the Water Risk Tool was used, while extreme weather events were evaluated using the Natural Hazard Overview and Risk Assessment Austria Tool (HORA). Detailed information on key figures relating to measurement technology, approximate values, etc. can be found in the glossary on p. 49.

There was a change in the ownership and management structure during the reporting period. The shares in CROMA-PHARMA GmbH are divided equally between Argus Vermögensverwaltungs GmbH & Co KG, Andreas Prinz and Martin Prinz. The Executive Board has been reduced to two people and is now made up of Andreas Prinz in his role as CEO and Peter Haidenek as CFO. The Supervisory Board was also reorganised (see chapter Croma at a glance, p. 5).

Compared to the previous year’s report, there have been changes to some key figures and tables in the Environment section. The adjustment of the E-PRTR value for 2023 is due to an incorrect interface transfer. Further changes have resulted from new table formats that are more closely aligned with ESRS and additional data collection. This affects key figures related to GHG emissions, resource inflows and outflows, as well as water.

Governance

GOV-1 The role of the administrative, management and supervisory bodies

The Global Director Sustainability & IMS reports directly to the CFO and, together with his team, is responsible for all environmental, social and governance aspects, including risk management and operational excellence. The sustainability strategy, including the targets and measures, is developed by the Director of the Global Sustainability & IMS

Department (GSID) in collaboration with the ESG Expert Group, a cross-departmental network of experts (see ESG governance chart on page 8), and defined in consultation with the Executive Board. The GSID Director is responsible for monitoring, evaluating and, if necessary, adjusting projects.

Sustainability issues are reported to the Supervisory Board, which currently has no employee representatives, and to the Executive Board at least once every six months. The members of the Executive Board and Supervisory Board have different qualifications in relation to industry and products, but also have knowledge of sustainability-related impacts, risks and opportunities.

The two co-owners, Andreas and Martin Prinz, for example, have extensive expertise in the areas of patient safety and health as well as product quality and safety, which they have acquired through their many years of experience in industry and their pharmaceutical studies. Peter Haidenek brings expertise in ESG-specific financial risks and opportunities, which he has gained through his work as Chief Financial Officer responsible for sustainability at a listed company. Johanna Piffl covers the key area of compliance with her law degree and several years of professional experience in a management role. Sebastian Semlitsch contributes his extensive expertise in investment and business management, particularly regarding the risk of an economic crisis. Bernhard Klemen can draw on his expertise in the areas of techbio, diagnostics and deep tech when it comes to innovation topics. Further expertise in sustainability, particularly in relation to circular economy or corporate risk management, is obtained as required from the GSID department or through external training courses.

Diversity and independence on the Supervisory Board	2023	2024
Men Supervisory Board	2	3
Women Supervisory Board	1	1
Men Supervisory Board (%)	66.7	75.0
Women Supervisory Board (%)	33.3	25.0
Supervisory Board members under the age of 30 (%)	0.0	0.0
Members of the Supervisory Board aged 30-50 (%)	100.0	50.0
Members of the Supervisory Board over the age of 50 (%)	0.0	50.0
Independence of the Supervisory Board (%)	66.7	25.0

Sustainability management, including effectiveness measurement, is controlled jointly by the ESG Expert Group and the Environmental Team via the environmental management system in accordance with ISO 14001, the annual management review and the risk management process in accordance with ISO 31000. From 2025, a risk management report will be submitted to the Executive Board annually. The Supervisory Board evaluates corporate decisions, e.g. in relation to sustainability projects, strategy or budget. One of the four Supervisory Board members is independent and has no business or personal relationship with the company or its management that could give rise to the risk of a material conflict of interest.

The ESG Steering Committee, which consists of the Executive Board and the GSID management and is supplemented by other experts as required, is the final authority for strategic decisions. This relates to the handling of material impacts, risks and opportunities as well as the resources for the implementation of measures. Progress made in achieving targets, along with business events and external influences are assessed and decisions on budgets are made at the semi-annual meetings.

The members of the ESG Expert Group are employees in management positions from areas with a significant ESG impact, including GSID. Their range of tasks includes both advisory activities and the implementation of measures approved by the ESG Steering Committee. This also includes identifying potential for optimisation, ensuring project success, and taking responsibility for cost statements and realigning

strategies and targets. In addition to analysing the status quo regarding target achievement, internal and external developments that could influence the action roadmap are also discussed.

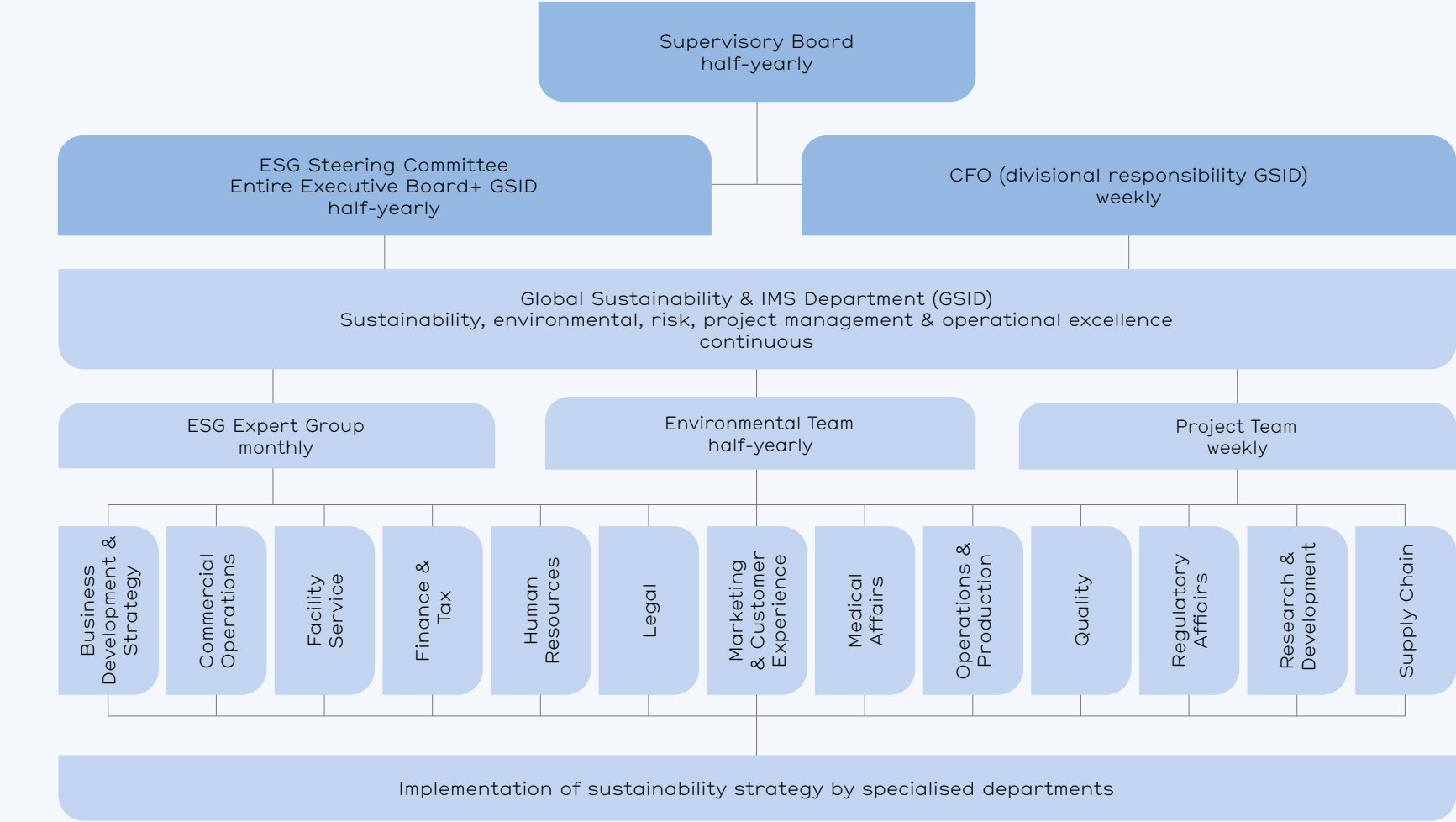
GOV-2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies

The topics agreed as part of the ESG Steering Committee and management reviews included the effectiveness assessment of the sustainability and environmental management system, stakeholder engagement and the stakeholder survey, ESG ratings, environmental management certification in accordance with ISO 14001, the IMS pilot project on supplier management, the introduction of corporate risk management with an ESG focus and a web-based legal register, the optimisation of the ESG data management process and the expansion of the process map to include ESG aspects. The material topics identified through the materiality analysis are also discussed at meetings with the Executive Board. During the reporting period, the Supervisory Board focused on employee-related issues, including furloughs, taking social aspects into account, employee benefits, expanding the training programme and talent management, the Sustainability Report and the award it received, as well as compliance issues.

GOV-3 Integration of sustainability-related performance in incentive schemes

Sustainability-related performance is not integrated into the current incentive scheme. However, due to the relevance of the topic, the management will examine the possibility of including it in future.

ESG governance



GOV-4 Statement on due diligence

By applying due diligence processes, both existing and potential risks or impacts can be identified in advance or after product use by means of complaints. This contributes significantly to the successful implementation of the sustainability strategy. On the one hand, this is based on clear and efficient ESG governance and due diligence checks in the areas of employment and the supply chain. On the other hand,

management systems such as ISO 13485, 14001 and 31000, or comprehensive clinical studies and strict reviews by notified bodies ensure rigorous compliance with specific requirements and a continuous improvement process. The GSID department is based on an integrative approach and combines sustainability, environmental, risk, project and quality management as well as operational excellence. The following table provides an overview of the core elements of due diligence, including corresponding page references.

Overview of the fulfilment of due diligence

Core elements of due diligence	Paragraphs in the sustainability statements
Embedding due diligence in governance, strategy and business model	p. 8 seq.
Engaging with affected stakeholders in all key steps of the due diligence	p. 11 seq.
Identifying and assessing adverse impacts	p. 12 seqq.
Taking actions to address those adverse impacts	p. 18 seqq.
Tracking the effectiveness of these efforts and communicating	p. 18 seqq.

GOV-5 Risk management and internal controls over sustainability reporting

The main risk lies in missing or partially insufficient data, particularly regarding the upstream and downstream value chain. Croma addresses these challenges with external support by using approximate values and internal company processes. In addition, cooperation with suppliers and transport service providers has been intensified regarding ESG data, which is reflected in higher data accuracy. To ensure internal data quality, the data management process is based on a dual control principle. The data collected is gathered, aggregated, checked and recorded in a web-based tool by division-specific data managers. Further evaluations are carried out by the division management or a specialist and the ESG Expert Group. GSID is responsible for the final review and approval of reports in consultation with the Executive Board.

Strategy

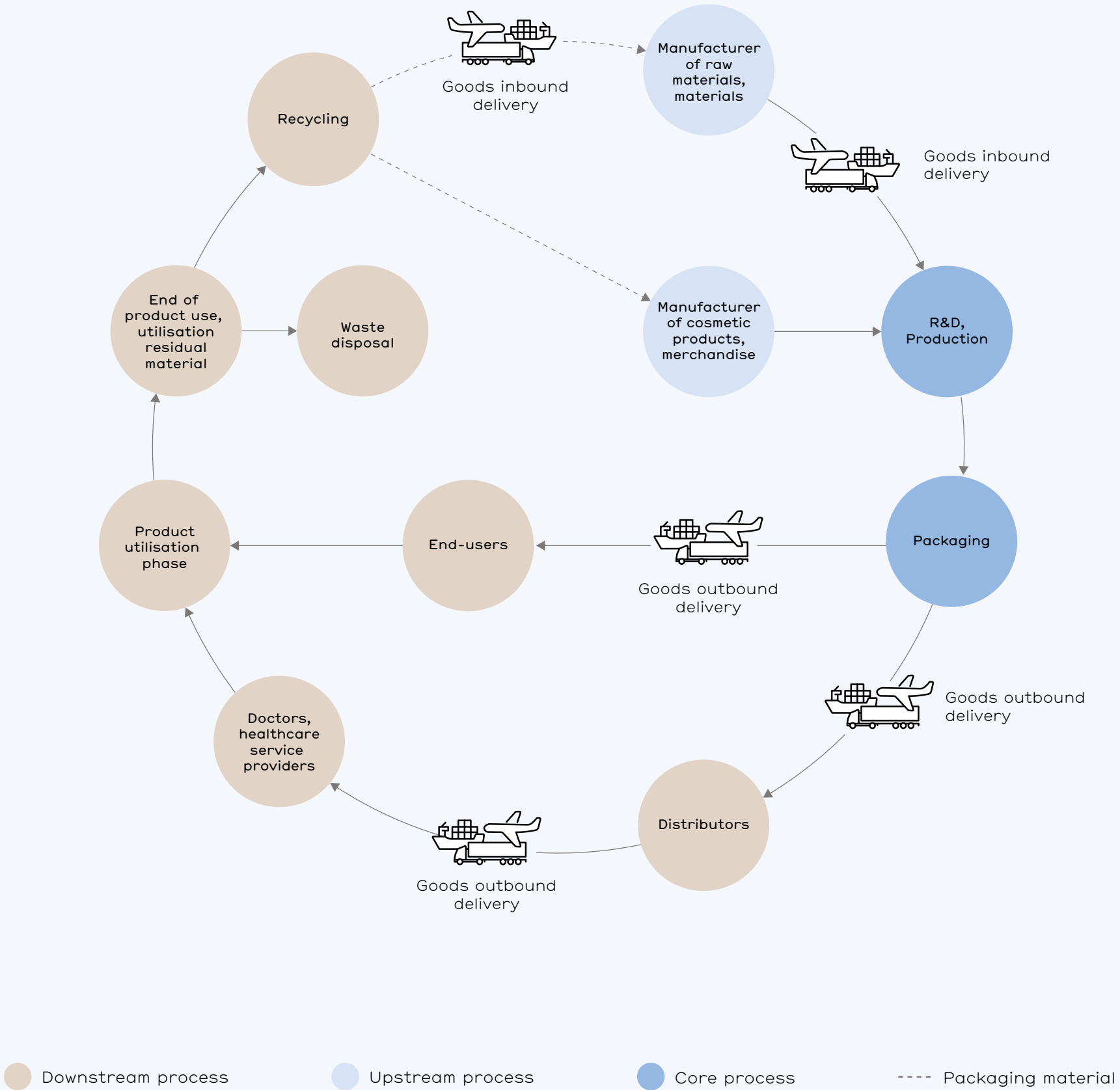
SBM-1 Strategy, business model and value chain

CROMA-PHARMA GmbH was founded in 1976 by pharmacists Gerhard and Karin Prinz, a married couple, as a family business. The company is a limited liability company based in Austria and has European affiliates (see organisational structure diagram on p. 5). Croma is a highly specialized and leading European producer of high-quality hyaluronic acid injections. The company specialises in minimally invasive aesthetic medicine - its innovative aesthetic portfolio includes hyaluronic acid fillers, biostimulators, lifting threads and botulinum toxin, as well as its own skin

care range. Croma also offers hyaluronic acid products for use in ophthalmology and orthopedics. The positive effects of the products are evident in the improvement of mental well-being and the alleviation of physical limitations (e.g. visual impairments or joint pain). Croma develops its own products, licenses distribution rights both in-house and externally, acts as a contract manufacturer and works with joint venture and distribution partners (see country chart on page 4). The main material inputs for hyaluronic acid fillers are sodium hyaluronate, glycerol, disodium hydrogen phosphate and sodium dihydrogen phosphate, sodium chloride, citric acid and water for injection. The company does not engage in any business activities that have a significant impact on, for example, the manufacture of chemicals, fossil fuels, tobacco or weapons. Information on the organisational structure and other relationships of Croma with related companies and persons can be found in the section ‘Croma at a glance’ (page 5).

Croma’s sustainability strategy reflects the key impacts, risks and opportunities of the business model along the entire value chain. Doctors and healthcare providers, joint venture, licensing or OEM partners, as well as business partners in the B2C and sales sectors, suppliers and end consumers are important economic players in this context. Detailed information, including information on targets and measures, can be found in the Environment, Social and Business Conduct chapters.

Value chain



The 17 United Nations Sustainable Development Goals Targets serve as guidelines for the strategy and are linked to the material topics identified in the double materiality analysis. The analysis in accordance with ESRS standards assesses the interactions between the business model and the upstream and downstream value chain with the environment and society. The results of the annual review of the double materiality analysis are incorporated into the review of the sustainability strategy and may trigger the implementation of improvement measures. The final approval of the strategy is granted by the Executive Board. The individual discussions and group meetings with the members of the ESG Expert Group and the Executive Board have the following objectives:

- Creating transparency about the status quo of sustainability management and the degree to which the sustainability targets are being met
- Creating a common basis for understanding the most pressing sustainability issues and challenges and, if necessary, adjusting the roadmap
- Identifying expectations and requirements for annual reporting

The key topics identified are climate change, water and marine resources, resource use and circular economy, own workforce, consumers and end-users, as well as business conduct. The corresponding area-specific targets and measures contribute to the achievement of 10 SDGs. Specifically, these are sustainability goals 3, 5, 6, 7, 8, 9, 10, 12, 13 and 16. The biggest environmental challenges are energy consumption, transport-related GHG emissions, resource consumption and waste, especially in the downstream value chain. To meet these challenges, Croma is focusing on energy and resource efficiency measures and plans to gradually align its product range with circular economy principles. In terms of social issues, the aim is to retain key and permanent staff through employee benefits and training programmes and to increase employee satisfaction. In addition, the company is pushing ahead with its commitment to ethical marketing and further expanding its patient safety measures. In the area of business conduct, Croma is focusing on raising awareness of ethics and compliance and promoting sustainability-specific procurement measures. The strategy is being implemented on the basis of long-term and quantitative targets.

Targets and progress

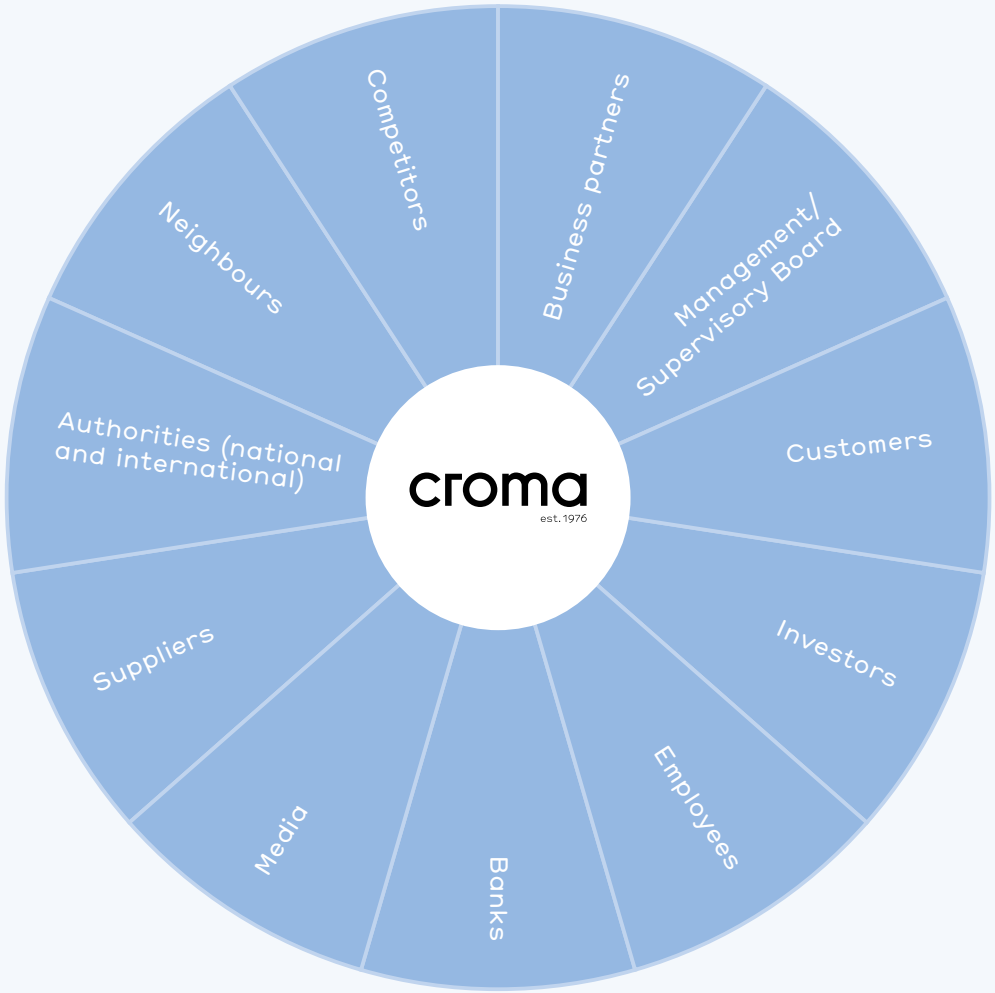
ESRS topics	Targets and milestones	Time horizon	Status	SDG
Climate change	Achieving climate neutrality of the company for Scope 1+2 (reduction by 100% in each case: base year 2023)	2035		7,13
	• Introducing an energy management system	2028		
	• Using 100% green energy throughout the company (base year 2023)	2026		
	• Creating a calculation model for company-wide GHG emissions and energy consumption	2025		
	Reducing transport emissions (Scope 3) in the logistics sector by 50% (base year 2023)	2035		
	• Developing and measuring science-based targets	2026		
Water and marine resources	Reducing fresh water consumption (per unit produced) in the production process by 20% (base year 2023)	2030		6
	• Drawing up a strategy paper on increasing water efficiency incl. a catalogue of measures	2026		
Resource use and circular economy	Achieving 0% landfill waste (HQ)	2025		9,12
	• Creating a calculation model for company-wide waste by waste type and recycling method	2025		
	Achieving 0% virgin plastic in secondary and tertiary packaging	2030		
	• Implementing a research project to increase innovation in the secondary and tertiary packaging	2028		
	Introducing a circular cosmetics line from in-house production	2030		
	• Increasing the procurement volume of renewable and recycled secondary and tertiary packaging by 15% (base year 2024)	2030		
	• Increasing EU purchasing volume (raw materials, production, packaging) for in-house production to 90% (base year 2023)	2030		
	• Launching a pilot project for a circular cosmetics line	2028		

in planning in realisation realised late

ESRS topics	Targets and milestones	Time horizon	Status	SDG
Own workforce	Be nominated as a top Austrian employer	2026		3,5,8,10
	• Increasing average number of training courses per employee by 20% (base year 2023: 17h)	2026		
	• Reducing turnover rate to 8.5% (base year 2023: 18.1%)	2026		
	• Increasing proportion of women in top management by 100% (base year 2023: 15.4%)	2026		
	• Eliminating the gender pay gap	2026		
	• Keeping absenteeism rate constantly below 5%	2025		
	• Keeping performance review meetings at 100%	2025		
	• Maintaining a company rating on Kununu of at least 3 points	2025		
Consumers and end-users	Re-authorising all existing product groups under MDR	2024		3
	• Achieving MDR re-authorisation of all dermal fillers (100%)	2024		
	Implementing screening for all marketing campaigns according to ethical marketing principles	2026		
	• Developing screening parameters for ethical marketing	2025		
Business conduct	Practising active corporate risk management	2026		8,16
	• Gradually introducing a corporate risk management system	2025		
	Conducting Code of Conduct training for 100% of employees	2026		
	• Implementing Code of Conduct training for 100% of affiliates	2025		
	• Implementing Code of Conduct training for 50% of employees	2025		
	• Implementing Code of Conduct training for 100% of new entrants	2025		
	Performing ESG screenings of all Croma business partners	2026		
	• Demanding commitment to the Code of Conduct from all partner companies	2025		
	• Demanding commitment to the Code of Conduct from all new contracting partners	2024		
	Achieving positive completion of company-wide compliance audits	2026		
	• Introducing assessment model for compliance audits	2025		
	Practising an active integrated management system	2027		
	• Gradually introducing an integrated management system	2026		
	Procuring materials and raw materials exclusively from sustainable companies	2030		
	• Developing an evaluation model for sustainable companies	2025		

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Stakeholder groups



SBM-2 Interests and views of stakeholders

Croma has a stakeholder engagement plan that is updated by the respective stakeholder group managers (department heads) following the annual review of the stakeholder matrix. The influence of the stakeholder group is recorded along with the level of engagement, obstacles and drivers, as well as the frequency of communication, the communication channel and the type of information. The aim is to identify the interests and motives of the most important stakeholders and to determine the communication methods to be used. The following process is applied:

- Documentation of the extent to which internal and external stakeholders are involved in the company’s activities
- Definition of the influence that stakeholders have on the company
- Description of the strategy for communication with stakeholders
- Recording the contact with each stakeholder, the communication channel used and the type of information to be communicated

The dialogue with key stakeholders takes the form of face-to-face meetings, surveys, external training courses, network meetings, ESG Expert Group and Steering Committee meetings, congresses, business and management reviews, media campaigns and the publication of the Sustainability Report. The outcome of the sustainability-specific stakeholder survey confirms at the beginning of 2025 confirm the results of the internal materiality analysis and the resulting sustainability strategy. The following topics were identified as material: Employment relationships, work-life balance, training and skills development, sustainable supply chains, resources and circular economy, sustainable developments and labelling, climate and energy, product safety and quality, patient safety and health, stakeholder engagement, ethical marketing, taxonomy regulation, ethics and compliance and strengthening the business location.

Another opportunity for interaction is the company's internal ideas workshop. This involves suggestions for improvements that create significant added value for the company and its employees. This added value can

relate to costs or efficiency, for example, but also to factors related to environmental, social and governance aspects. During the reporting period, 23 ideas were submitted. Three of these were awarded bonus payments at the beginning of 2025 in the categories 'Largest savings' (in connection with media monitoring), 'Most ideas completed in a team' and 'Largest impact on company targets' (filling material made from 100% recycled material).

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

The impacts, risks and opportunities identified in the materiality analysis are determined and assessed considering their probability of occurrence, time horizon, impact on the business model and relevance to the value chain. Unlike last year, the topic of 'Workers in the value chain' was no longer identified as material. The targets relating to business partners have been incorporated into the list of targets for business conduct. The following table sums up the material topics. Further information can be found in the section-specific chapters.

Material impacts, risks and opportunities

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Climate change								
Climate change mitigation								
Climate change intensification	Actual negative impact		●	●	●	●	●	●
Political and legal transition risks	Risk	Financial impact Operating costs		●				●
Low-emission products	Opportunity	Financial impact Sales	●	●	●			●
Environmentally friendly transport logistics	Opportunity	Financial impact Sales	●	●	●		●	●
Climate change adaptation								
Physical risks	Risk	Financial impact Operating costs		●			●	●
Technological risks	Risk	Financial impact Investment costs		●				●
Financial incentives through subsidies	Opportunity	Financial impact Investment costs		●		●	●	
Energy								
Use of fossil fuels	Actual negative impact		●	●		●	●	●
Political and legal transition risks	Risk	Financial impact Operating costs		●		●	●	●
Increase in share of self-generated energy	Opportunity	Financial impact Operating costs		●		●	●	●
Water and marine resources								
Water consumption								
Fresh water consumption	Actual negative impact		●	●		●	●	●
Political and legal transition risks	Risk	Financial impact Operating costs		●				●
Water efficiency measures	Opportunity	Financial impact Operating costs		●				●

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Material impacts, risks and opportunities								
Resource use and circular economy								
Resources inflows, including resource use								
Resource consumption	Actual negative impact		●	●		●	●	
Sustainable product packaging	Opportunity	Financial impact Operating costs		●			●	●
Circular product portfolio	Opportunity	Financial impact Sales		●				●
Waste								
Waste generation	Actual negative impact			●	●	●	●	●
Own workforce								
Working conditions - Secure employment								
Creating and securing jobs	Actual positive impact			●			●	●
Working conditions - Working time								
Staff shortage	Risk	Financial impact Sales		●		●		
AI and process automation	Opportunity	Financial impact Operating costs		●			●	●
Working conditions - Adequate wages								
Personnel costs	Risk	Financial impact Operating costs		●		●	●	

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Material impacts, risks and opportunities								
Working conditions - Work-life balance								
Work-life balance	Actual positive impact			●			●	●
Strengthening employee satisfaction	Opportunity	Financial impact Operating costs		●			●	●
Equal treatment and opportunities for all - Training and skills development								
Building up and securing expertise	Actual positive impact			●			●	●
Equal treatment and opportunities for all - Employment and inclusion of persons with disabilities								
Non-fulfilment of employment obligation	Actual negative impact			●		●		
Consumers and end-users								
Information-related impacts for consumers and/or end-users - Access to (quality) information								
Criminal proceedings due to misleading information	Risk	Financial impact Investment costs		●	●	●	●	●
Personal safety of consumers and/or end-users - Health and safety								
Mental well-being	Actual positive impact				●	●	●	●
Alleviation of physical limitations	Actual positive impact				●	●	●	●
Criminal proceedings due to health impairments	Risk	Financial impact Investment costs		●	●	●	●	●
Strengthening customer satisfaction	Opportunity	Financial impact Sales		●	●	●	●	●

Material impacts, risks and opportunities

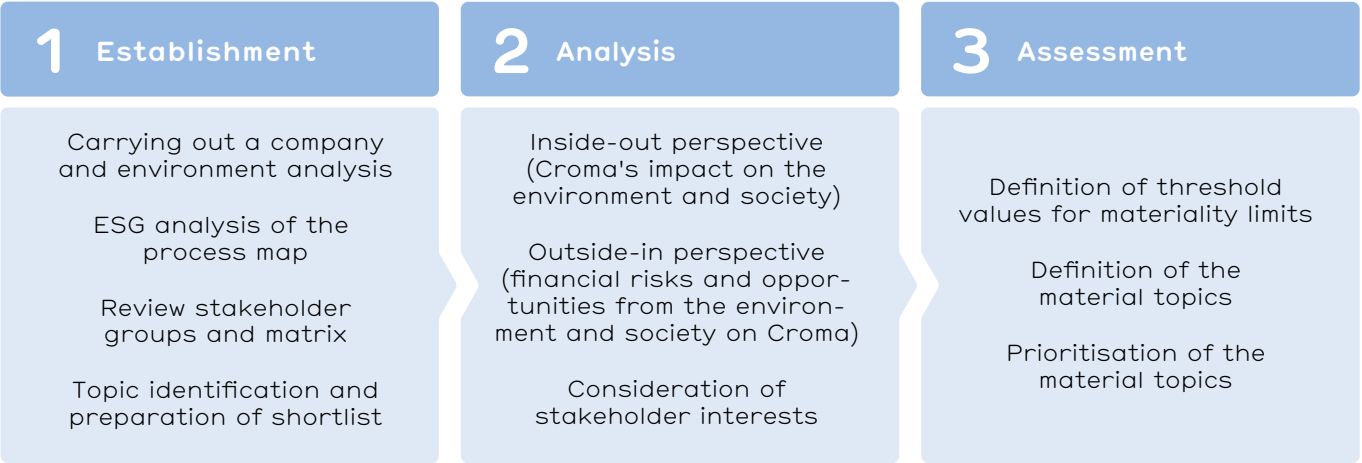
Business conduct								
Corporate culture								
Positive corporate culture	Actual positive impact			●			●	●
Expandable compliance management	Risk	Financial impact Investment and operating costs	●	●	●	●	●	●
Insufficient integration of corporate management systems	Risk	Financial impact Investment and operating costs	●	●	●	●	●	●
Cybercrime	Risk	Financial impact Investment costs		●		●	●	●
Economic crisis	Risk	Financial impact Sales	●	●	●	●	●	●
AI and process automation	Opportunity	Financial impact Operating costs		●			●	●
Sustainability management	Opportunity	Financial impact Sales, operating costs	●	●	●		●	●
Stakeholder engagement	Opportunity	Financial impact Sales	●	●	●	●	●	●
Animal welfare								
Causing animal suffering	Actual negative impact		●			●	●	
Management of relationships with suppliers including payment practices								
Regional added value	Actual positive impact		●	●		●	●	●
Sustainable supply chains	Opportunity	Financial impact Sales	●	●		●	●	●

Impact, risk and opportunity management
IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities

The process for identifying and assessing material impacts, risks and opportunities is based on key ESG KPIs (e.g. energy and emission figures). It comprises a holistic approach that includes upstream and downstream processes as well as main processes, and is divided into the following steps:

- Company and environment analysis (based on legal requirements, competitive benchmarking, ESG ratings)
- Analysis of the process map, identifying those processes that have significant ESG impacts, risks or opportunities

Process flow



The thresholds for risks and opportunities were determined in relation to EBITDA and the probability of occurrence and assessed using a five-point scale ranging from ‘low or unlikely’ to ‘very high or very likely’. The impacts were assessed in terms of probability of occurrence and severity, with a weighted materiality threshold of 2.5. The resulting findings are incorporated into the PESTEL analysis and subsequently considered in the corporate risk management

- Review stakeholder groups and matrix
- Topic identification and consolidation in the form of a shortlist
- Identification and assessment of the environmental and social impacts of the business model as well as the business risks and opportunities
- Consideration of stakeholder interests (ESG Expert Group, Executive Board, experts, comparison of double materiality assessment results with evaluation of stakeholder survey)
- Determination of threshold values for the definition of material topics, considering the degree of severity, the probability of occurrence and a short, medium and long-term time horizon
- Definition of the material ESRS topics
- Prioritisation of the material topics

system. This and the environmental management system act as internal control mechanisms.

IRO-2 Disclosure requirements in ESRS covered by the undertaking’s sustainability statements
No significant impacts, risks or opportunities were identified in the following areas during the analysis: environmental pollution, biodiversity and ecosystems, workforce in the value chain and affected communities.

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Standards	Specification	Page	SDG
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GOV-1	The role of the administrative, management and supervisory bodies	7 seq.	
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	8	
GOV-3	Integration of sustainability-related performance in incentive schemes	8	
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SBM-2	Interests and views of stakeholders	11 seq.	
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	12 seqq.	
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S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	33	
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	33 seq.	
S1-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	34	
S1-6	Characteristics of the undertaking's employees	35	
S1-7	Characteristics of non-employee workers in the undertaking's own workforce	35	
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S4-4	Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	41	
S4-5	Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	42	
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Data points from other EU legislation

Disclosure requirement and related data point	Materiality
ESRS 2 GOV-1 Board’s gender diversity	p. 7
ESRS 2 GOV-1 Percentage of board members who are independent	p. 7 seq.
ESRS 2 GOV-4 Statement on due diligence	p. 8 seq.
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities	not material
ESRS 2 SBM-1 Involvement in activities related to chemical production	not material
ESRS 2 SBM-1 Involvement in activities related to controversial weapons	not material
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco	not material
ESRS E1-1 Transition plan to reach climate neutrality by 2050	p. 19
ESRS E1-1 Undertakings excluded from Paris-aligned Benchmarks	not material
ESRS E1-4 GHG emission reduction targets	p. 22
ESRS E1-5 Energy consumption from non-renewable sources disaggregated by sources (only high climate impact sectors)	not material
ESRS E1-5 Energy consumption and mix	p. 22
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors	not material
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions	p. 23
ESRS E1-6 Gross GHG emissions intensity	not material
ESRS E1-7 GHG removals and carbon credits	p. 24
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks	not material
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk / Location of significant assets at material physical risk	not material
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes	not material
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities	not material
ESRS E2-4 Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil	p. 22
ESRS E3-1 Water and marine resources	p. 25
ESRS E3-1 Dedicated policy	p. 25
ESRS E3-1 Sustainable oceans and seas	not material
ESRS E3-4 Total water recycled and reused	p. 26
ESRS E3-4 Total water consumption in m³ per net revenue on own operations	p. 26
ESRS 2 - SBM-3 - E4	not material

Disclosure requirement and related data point	Materiality
ESRS E4-2 Sustainable land agriculture practices or policies	not material
ESRS E4-2 Sustainable oceans/seas practices or policies	not material
ESRS E4-2 Policies to address deforestation	not material
ESRS E5-5 Non-recycled waste	p. 29
ESRS E5-5 Hazardous waste and radioactive waste	p. 29
ESRS 2 SBM3 - S1 Risk of incidents of forced labour	not material
ESRS 2 SBM3 - S1 Risk of incidents of child labour	not material
ESRS S1-1 Human rights policy commitments	p. 32
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	p. 31 seqq.
ESRS S1-1 Processes and measures for preventing trafficking in human beings	not material
ESRS S1-1 Workplace accident prevention policy or management system	p. 32 seq.
ESRS S1-3 Grievance/complaints-handling mechanisms	p. 33
ESRS S1-14 Number of fatalities and number and rate of work-related accidents	p. 38
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness	p. 38
ESRS S1-16 Unadjusted gender pay gap	p. 38
ESRS S1-16 Excessive CEO pay ratio	p. 38
ESRS S1-17 Incidents of discrimination	p. 32 seq.
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD Guidelines	p. 31 seqq.
ESRS 2 SBM3 - S2 Significant risk of incidents of child labour or forced labour in the value chain	not material
ESRS S2-1 Human rights policy commitments	not material
ESRS S2-1 Policies related to value chain workers	not material
ESRS S2-1 Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines	not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8	not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain	not material
ESRS S3-1 Human rights policy commitments	not material
ESRS S3-1 Non-respect of UNGPs on Business & Human Rights, ILO principles or OECD guidelines	not material
ESRS S3-4 Human rights issues and incidents	not material

Disclosure requirement and related data point	Materiality
ESRS S4-1 Policies related to consumers and end-users	p. 40
ESRS S4-1 Non-respect of UNGPs on Business and Human Rights and OECD guidelines	p. 39 seqq.
ESRS S4-4 Human rights issues and incidents	p. 41
ESRS G1-1 United Nations Convention against Corruption	p. 45 seq.
ESRS G1-1 Protection of whistle-blowers	p. 45
ESRS G1-4 Fines for violation of anti-corruption and anti-bribery laws	p. 47
ESRS G1-4 Standards of anti-corruption and anti-bribery	p. 46 seq.

Environment

Climate change ESRS E1	19
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Resource use and circular economy ESRS E5	27

6

CLEAN WATER AND SANITATION



7

AFFORDABLE AND CLEAN ENERGY



9

INDUSTRY, INNOVATION AND INFRASTRUCTURE



12

RESPONSIBLE CONSUMPTION AND PRODUCTION



13

CLIMATE ACTION

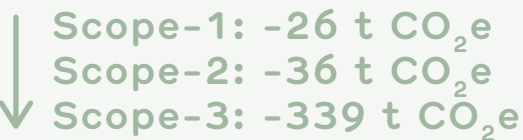


For around two years, Croma has been using CO₂ instead of phosphoric acid for wastewater neutralisation – an environmentally friendly solution with multiple benefits. The carbon dioxide produced during the reaction is biodegradable and does not pollute aquatic ecosystems. At the same time, precise pH control enables particularly efficient and safe wastewater treatment. In this way, Croma actively contributes to the protection of natural resources and the promotion of sustainable environmental standards.



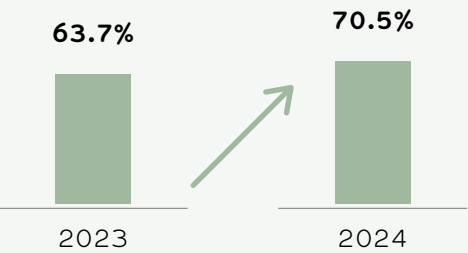
Performance highlights

Reduction in location-based gross GHG emissions (tonnes of CO₂e)



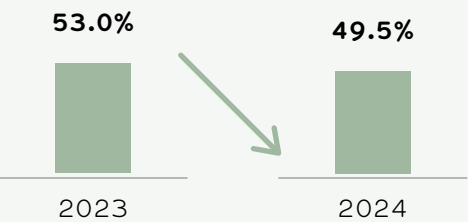
There is a need for action with regard to process emissions, secondary and fossil fuels (Scope 1) and in the value chain, for example with regard to purchased goods, services and the further processing of sold products.

Increase in the proportion of non-hazardous waste recycled



The proportion of recycling has increased in relation to the total amount of non-hazardous waste.

Reduction of non-recycled waste



The amount of non-recycled waste was reduced by 15 tonnes.

Climate Change

Climate change is one of the greatest challenges of our time. Companies play a key role in this, particularly by reducing greenhouse gas emissions. With its catalogue of environmental measures, Croma aims to continuously improve its own environmental footprint, achieve economic benefits in the medium to long term and thus strengthen its competitiveness. The most important measures include switching to sustainable materials and production processes, promoting e-mobility, reducing business travel through digital communication and implementing an environmental management system. An essential component is the regular calculation of the carbon footprint (CCF) in order to identify key sources of emissions and implement targeted reduction measures. In addition, Croma also takes into account physical risks of climate change such as extreme weather events. Structural reinforcements, early warning systems and emergency plans protect production facilities and employees – and ensure the resilience and sustainability of business operations.

Governance
ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes
Sustainability-related performance is not integrated into the current incentive system. However, due to the relevance of the topic, the management will examine the possibility of including it in future.

Strategy
E1-1 Transition plan for climate change mitigation
With its decarbonisation strategy, which has been reviewed and approved by the Executive Team, Croma aims to make a targeted contribution to reducing global warming and thus promote the achievement of SDGs 7 and 13. With its environmental management system certified to ISO 14001 since April 2024, environmental aspects are systematically monitored and continuously improved. In this way, Croma ensures

optimisation and operational integrity in line with its environmental policy and at the same time plans to implement the goal of decarbonisation (net zero) by 2040 at the latest (requirement in Austria). The corporate carbon footprint (CCF) serves as the starting point for the implementation of specific plans to reduce CO₂ and costs as well as for the development of SBTs, which are targeted for 2026.

In its planned climate protection strategy, Croma will also address limiting global warming to 1.5 °C – in line with the Paris Climate Agreement – and will discuss this issue in the Supervisory Board. The key levers for the planned climate-specific transition plan, such as investments in machinery and equipment, fuels for production, road transport and packaging materials, as well as air transport for initial logistics, will then be accompanied by a targeted catalogue of measures.

Production-related natural gas consumption (e.g. for steam generation) poses a particularly major challenge in this regard. The status quo of target achievement in relation to the current decarbonisation strategy is shown in the Sustainability Roadmap on page 22. The company is not exempt from the Paris-aligned Benchmarks.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
Climate change and its consequences affect business activities to varying degrees and over different time horizons. With the help of the DWA and the climate scenario analysis planned for 2025, climate-specific effects and developments can be recognised and managed at an early stage. Actual negative effects as well as risks and opportunities were identified as part of the double materiality analysis.

Impacts
Climate change intensification (actual, negative) – Croma aims to reduce GHG emissions by switching to bubble wrap made from 100% recycled material, strengthening e-mobility with the option of using e-charging stations (whereby the expansion of further charging points is planned), increasing the use of digital meetings, identifying key levers for reducing GHG emissions (by calculating the CCF), using more energy-efficient machines (e.g. pallet wrappers) and by applying the Green Mobility Policy, which is currently being implemented.

Use of fossil fuels (actual, negative) – With modern and energy-efficient machines, PV systems, an energy community, an environmental management system, standardised energy consumption recording and a green mobility policy, Croma aims to reduce the use of fossil fuels in the upstream manufacturing process and in transport. In addition, the company intends

to minimise natural gas consumption in the company-specific production process – used for clean room ventilation, steam generation and sterilisation processes.

Risks and opportunities
Risks
Political and legal transition risks – With a corporate risk and environmental management system and the compliance web tool, which will be fully implemented in spring 2025, Croma intends to monitor legal and geopolitical developments more closely and thereby minimise legal risks related to climate protection, such as rising operating costs due to CO₂ pricing, at an early stage.

Physical risks – Loss of revenue because of business interruptions – e.g. due to acute risks caused by extreme weather – is combated by Croma with automated emergency systems, its own emergency plans, the corporate risk management system and the use of early warning systems and tools such as the Aqueduct Water Risk Atlas and the Natural Hazard Overview and Risk Assessment Austria Tool. Chronic risks associated with shifts in climate patterns can also have a significant impact. Increased outdoor temperatures pose a risk of impairing product quality and effectiveness if, for example, goods are stored outdoors for long periods of time.

Technological risks - Another risk lies in the increased investment costs for the transition to more resource- and environmentally friendly technologies and production processes. This is associated with a long-term time horizon, as both the production plant and machinery were purchased a few years ago and are therefore state of the art.

Political and legal transition risks - Croma is responding to rising energy prices and the associated increase in operating costs with plans to expand its own PV system, an energy community, a corporate risk and environmental management system, and a compliance web tool.

Opportunities
Low-emission products - By offering sustainable and environmentally friendly products and consciously focusing on “Made in Europe,” Croma aims to protect the climate and increase sales long term. The development of the concept for a circular cosmetics line from its own production and the life cycle analysis carried out represent the first step in this context. Further information on the opportunities offered by a sustainable product portfolio can be found in the chapter on resource use and circular economy.

Environmentally friendly transport logistics - With its guidelines for environmentally friendly procurement, its green mobility policy currently being implemented, its target of shorter supply chains and optimized transport routes, and its sustainable procurement policy planned for 2025, Croma aims to reduce emissions and costs while increasing sales.

Financial incentives through subsidies - By taking advantage of climate and energy-specific subsidies, Croma aims to reduce investment costs associated with more environmentally friendly technologies and processes.

Increasing the proportion of self-generated energy - With the planned expansion of its PV systems and the associated increase in the proportion of self-generated energy for its own use, Croma aims to reduce its external energy requirements and thereby its operating costs.

Material impacts, risks and opportunities

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Climate change								
Climate change mitigation								
Climate change intensification	Actual negative impact		●	●	●	●	●	●
Political and legal transition risks	Risk	Financial impact Operating costs		●				●
Low-emission products	Opportunity	Financial impact Sales	●	●	●			●
Environmentally friendly transport logistics	Opportunity	Financial impact Sales	●	●	●		●	●
Climate change adaptation								
Physical risks	Risk	Financial impact Operating costs		●			●	●
Technological risks	Risk	Financial impact Investment costs		●				●
Financial incentives through subsidies	Opportunity	Financial impact Investment costs		●		●	●	
Energy								
Use of fossil fuels	Actual negative impact		●	●		●	●	●
Political and legal transition risks	Risk	Financial impact Operating costs		●		●	●	●
Increase in share of self-generated energy	Opportunity	Financial impact Operating costs		●		●	●	●



Impact, risk and opportunity management
ESRS 2 IRO-1 Description of the processes to identify and assess material climate-related impacts, risks and opportunities

The material impacts, risks, and opportunities were identified along the entire value chain based on a double materiality analysis, taking into account a short, medium, and long-term time horizon. The focus is on the Austrian production site. The key topics were compared with the results of the stakeholder survey conducted at the beginning of 2025 and confirmed. To assess physical risks, such as water risks (fresh water consumption, heavy rainfall events), the company used the Natural Hazard Overview & Risk Assessment Austria Tool (HORA) and the Aqueduct Water Risk Atlas. Another important tool for identifying climate-related impacts is the annual corporate carbon footprint. The greatest need for action in Scope 1 relates to process emissions and secondary fuels and fossil fuels.

Scope 2 is significantly lower due to the predominant use of electricity from renewable energy sources. Of the Scope 3 emissions, capital goods account for the largest share of indirect greenhouse gas emissions at 31.9%. Of the remaining categories, purchased goods and services and upstream transport and distribution account for the second and third largest shares of Scope 3 at 16.8% each. A methodological investigation in the form of a climate scenario analysis based on IPCC guidelines is planned for 2025. The analysis will focus on the Croma production site and the business partners with the highest risk of failure.

E1-2 Policies related to climate change mitigation and adaptation

In order to manage the material impacts, risks and opportunities, Croma relies on a decarbonisation strategy, an environmental management system in accordance with ISO 14001, an environmental management manual, the measurement of the corporate carbon footprint and, in a broader sense, the sustainability strategy. The strategies are reviewed annually to ensure they are up to date, approved by the Executive Board and then published on the intranet and website. In addition, sustainability and risk management supports the monitoring of climate-specific aspects.

The Global Sustainability & IMS Department is responsible for monitoring progress toward climate-related targets. It drives the climate program forward in collaboration with the ESG Expert Group and the Environmental Team. GSID maintains a weekly dialogue with the CFO to whom the department reports. Project results, climate-related risks and opportunities, as well as strategies and targets, are presented to the ESG Steering Committee every six months.

E1-3 Actions and resources in relation to climate change policies

To increase the share of renewable energy, photovoltaic systems have been installed at the site, and their rated output is to be increased through the planned expansion. The energy generated is used, for example, for lighting or for the on-site charging stations for

hybrid and electric vehicles. The reduction in the number of printers on each floor, the consistent use of team calls, a home office option, and the continuous modernization of equipment and machines have led to increased efficiency and reduced mobility.

The modernization of the packaging line also falls into this category. The new, energy-efficient system, which is expected to be certified in summer 2025, consumes 12% less electricity than the old packaging line. Another project that has already been implemented to reduce greenhouse gas emissions and improve material efficiency is the switch to a new pallet wrapper. This emits around 2.7 tonnes less CO₂. The reduction is achieved by pre-stretching the wrapping film in the automatic wrapping machine. This means that the pallets can be wrapped using significantly less material. One project implemented as part of the ideas workshop to reduce virgin plastic consumption is the switch to air bubble wrap made from 100% recycled plastic for shipping goods. According to the product sheet, the new material emits 30% less CO₂ during the manufacturing process and requires 29% less fossil energy. The foldable intermediate storage and transport boxes make a further contribution to climate protection. These have significantly reduced the company's internal storage space requirements and, as a result, transport to external warehouses and the pallet space used there. Information on further measures and their connection to climate-specific targets and implementation periods can be found in the Sustainability Roadmap.

Metrics and targets

E1-4 Targets related to climate change mitigation and adaptation

The climate protection targets were set jointly with the ESG Expert Group and Executive Board based on the material topics identified, which were confirmed by the results of the stakeholder survey and the corporate carbon footprint. As the company-specific greenhouse gas emissions were calculated for the first time in 2023, this year also serves as the base year for reduction measures.

In 2025, the climate-specific roadmap will be compared with the results of the planned climate scenario analysis and later revised as part of the development of science-based targets with a reduction target of 1.5 degrees.

To measure progress in relation to climate targets, Croma analyses emissions by Scope, energy consumption by energy source and the amount of self-generated energy.

Sustainability Roadmap	Time horizon	Status
Target: Achieving climate neutrality of the company for Scope 1+2 (reduction by 100% in each case: base year 2023)	2035	
Milestones		
Introducing an energy management system	2028	
Using 100% green energy throughout the company (base year 2023)	2026	
Creating a calculation model for company-wide GHG emissions and energy consumption	2025	
Measures		
Switching outsourcing locations and affiliates to the use of green energy	2026	
Creating a concept for the use of waste heat from waste water	2026	
Identifying potential energy savings	2025	
Introducing an environmental management system in accordance with ISO 14001	2025	
Calculating corporate carbon footprint (Scope 1+2)	2024	
Target: Reducing transport emissions (Scope 3) in the logistics sector by 50% (base year 2023)	2035	
Milestone		
Developing and measuring science-based targets	2026	
Measures		
Introducing a green mobility policy	2025	
Calculating corporate carbon footprint (Scope 3)	2024	

in planning in realisation realised late

E1-5 Energy consumption and mix

Croma’s energy supply comes from green electricity and fossil fuels. Non-renewable fuels consist of natural gas, which is needed for production, and diesel and petrol, which are used for company vehicles and the emergency power generator, for example. Total energy consumption rose slightly compared to the

previous year, which is attributable to the increase in production volume. The production-related pollutant CO₂ listed in the E-PRTR Regulation (European Pollutant Release and Transfer Register) amounted to an estimated 859,000 kg in the reporting period (2023: 804,000 kg).

Energy	2022	2023	2024
Total energy consumption (MWh)	10,449	9,812	10,284
Total energy consumption from fossil sources	5,553	5,277	5,559
Share of total energy consumption (%)	53.1	53.8	54.1
Total energy consumption from renewable sources	4,896	4,535	4,725
Share of total energy consumption (%)	46.9	46.2	45.9
Fuel consumption for renewable sources (biomass, hydrogen, etc.)	0	0	0
Consumption of purchased electricity, heat, steam, cooling	4,680	4,340	4,538
Consumption of self-generated renewable energy (no fuels)	216	195	187



E1-6 Gross Scopes 1, 2, 3 and total GHG emissions

The company calculates its corporate carbon footprint for Scope 1, 2, and 3 based on locations and markets. The focus is on the headquarters and the production and packaging facility, as well as on the externally leased laboratory space in Austria, as this is where the majority of GHG emissions occur. The categories listed under Scope 3 as significant for Croma (listed according to the largest Scope 3 share) are: Capital goods, upstream transportation and distribution, purchased goods and services, downstream transportation, end-of-life treatment of sold products, business travel, employee commuting, fuels and energy, upstream leased assets, waste generated in operations. The processing and use of sold products are not included, as the associated emissions cannot be influenced by the company, nor are upstream and downstream leased assets, franchises, and investments, as these categories are not applicable.

The calculation of the corporate carbon footprint follows the Greenhouse Gas Protocol (GHG Protocol) for reporting greenhouse gas emissions at the organizational level and was prepared with external support. The equivalence factors according to the IPCC are used to calculate greenhouse gas emissions.

The basis for the calculation is data collected and provided by the company. Direct emissions (Scope 1) and indirect emissions (Scope 2) were calculated in full. Other indirect emissions from the upstream and downstream value chain (Scope 3) were included in the greenhouse gas balance sheet if material and in accordance with the available data. The calculation methods used include emission factors from the Austrian Federal Environment Agency and global emission factors from the Ecoinvent 3.10 database, records of energy consumption, consumption of relevant active ingredients and raw materials, average calculations and expenditure-based calculations, and primary data from logistics companies. Further information on the calculation methodology for the different Scopes can be found in the glossary on page 50.

The electricity purchased from external sources is generated from 100% renewable energy sources (hydropower, wind energy, solar energy, solid or liquid biomass, and other renewable energy sources) and mostly in Austria. A reduction was achieved in all three Scope categories.

Gross GHG emissions	2023	2024
Total location-based GHG emissions (t CO ₂ e)	8,562	8,161
Total market-based GHG emissions	7,605	7,247
Gross Scope 1 GHG emissions	963	937
Share of Scope 1 GHG emissions from regulated emissions trading systems (%)	0.0	0.0
Gross Scope 2 GHG emissions		
Gross location-based Scope 2 GHG emissions	804	768
Gross market-based Scope 2 GHG emissions	3	2
Gross Scope 3 GHG emissions by major category		
Gross location-based Scope 3 GHG emissions	6,795	6,456
Gross market-based Scope 3 GHG emissions	6,639	6,308
3.1 Purchased goods and services	819	1,058
3.2 Capital goods	3,253	2,009
3.3 Fuels and energy (market-based)	274	271
3.4 Upstream transportation and distribution	640	1,060
3.5 Waste generated in operations	86	78
3.6 Business travel	523	322
3.7 Employee commuting	415	319
3.8 Upstream leased assets	151	134
3.9 Downstream transportation	62	571
3.12 End-of-life treatment of sold products	417	486

E1-7 GHG removals and GHG mitigation projects financed through carbon credits

Croma does not trade in CO₂ certificates for the removal and storage of GHG emissions within the Scope of projects – neither in its own activities nor within the upstream and downstream value chain.

E1-8 Internal carbon pricing

When it comes to reducing emissions from fossil fuels, Croma has not yet relied on CO₂ pricing as a tool, but the issue will be analyzed in more detail in the coming years.

E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

The financial impact of ‘Political and legal transition risks’ relating to climate protection was assessed as medium (1-4% of EBITDA) in the long term. The same assessment applies to legal transition risks in connection with the energy sector in all three time horizons (1 year = short term, 2 to 5 years = medium term, and 6 to 30 years = long term), ‘Physical risks’ in the medium and long term, and ‘Technological risks’ in the long term.

The financial impact of the opportunity ‘Low-emission products’ was rated highly in a long-term perspective (4-10% of EBITDA). The opportunity ‘Environmentally friendly transport logistics’ received the same rating for the medium and long term. ‘Financial incentives through subsidies’ were rated as medium in a short and medium-term perspective. The financial impact of ‘Increasing the share of self-generated energy’ rises from moderate (0.2-1% of EBITDA) in the short and medium term – to medium in the long term. A more detailed climate scenario analysis is planned.



Croma at a glance
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Water and marine resources

Clean water is essential for the health of society and the protection of the environment. Croma is committed to the responsible use of this resource – not least because large quantities of it are required for production. Water is used in the manufacture of hyaluronic acid products, as well as for cleaning and steam sterilization. To reduce the negative impact on the environment, fresh water consumption is to be significantly reduced in the coming years through water efficiency and water management measures.

Impact, risk and opportunity management
ESRS 2 IRO-1 Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities

Material impacts, risks, and opportunities were identified using the Aqueduct Water Risk Atlas and the Natural Hazard Overview and Risk Assessment Austria Tool, as well as through a double materiality analysis. The focus here was on the production process (core process) and key suppliers in the upstream and downstream value chain. A further assessment of the topic of water was carried out as part of the survey of the ‘neighbours’ stakeholder group, which rated the reduction of fresh water consumption as important. The production site in Leobendorf is not affected by water stress or water scarcity and is not located in an area with a high risk of flooding. This was confirmed by the results of the tool evaluations. In the course of the double materiality analysis, ‘fresh water consumption’ – both in the manufacturing process of raw materials and in the production process of hyaluronic acid fillers including cleaning and steam generation – was identified as an actual negative impact. The ‘political and legal transition risks’ relate to the possibility of rising water prices, which in turn could lead to increased

operating costs. An opportunity arises from ‘water efficiency measures’ that would lead to a reduction in water consumption and thus to lower water costs. Further information on the procedure for conducting the double materiality analysis and on the inclusion of stakeholders’ interests and views can be found in the General Disclosures chapter on page 11 et seq.

E3-1 Policies related to water and marine resources

The environmental management system in accordance with ISO 14001 is used to identify and monitor environmental impacts, including water consumption and quality. This topic is anchored in both the Code of Conduct documents and the sustainability strategy with a specific water target. The greatest impact in terms of water is caused by fresh water consumption in the production process. Water for injection makes up the majority of the ingredients in hyaluronic acid fillers, accounting for around 90%. The production process for fillers does not cause water pollution and has no impact on local residents, as only the pH value of the water needs to be neutralised. To reduce the ecological footprint, grey water is discharged into the sewage system and then sent for conditioning. Production is not located in areas with water risks and

the site has no impact on seas or oceans. No marine resources are used in the manufacture of the raw and auxiliary materials required for production or in the production process. As the impacts, risks and opportunities associated with climate change and resource consumption, with a focus on waste management, are rated higher, the issue of water has a lower priority. Croma has not yet implemented a water management concept including water treatment measures or sustainable water procurement. As a first step towards reducing water consumption, Croma is focusing on creating a calculation model for company-wide water consumption, withdrawal and recycling.

The Global Sustainability & IMS Department is responsible for monitoring progress towards achieving these targets and promotes water efficiency within the ESG Expert Group. The network regularly analyses the current status of the measures taken and revises the procedures and strategy as necessary. The ISO 14001:2015 environmental management system also plays a key role in incorporating specific impacts, opportunities and risks into key corporate decisions and evaluating them periodically. The Sustainability & IMS Department is in regular contact with the CFO. In addition, water-specific impacts, project results, strategies and objectives are presented to the ESG Steering Committee every six months.

E3-2 Actions and resources related to water and marine resources

In the in-house production of medical devices and pharmaceuticals based on biopolymers, water is mainly used for bulk production (dissolving raw materials). Aqueous waste from production – consisting of product residues in the mixing vessels and dirty water from cleaning – is pre-treated in neutralisation tanks, then disposed of properly via the public sewer system and forwarded to the sewage treatment plant for treatment. The risk of water pollution is very low because

the products do not contain any toxic substances or substances that are harmful to the environment in higher concentrations.

A practical example of reducing the ecological footprint is the conversion of the neutralisation process. According to the wastewater association, the wastewater fed into the sewer system must be treated, i.e. neutralised to a pH value between 6.5 and 10. This used to be achieved by adding phosphoric acid. Neutralisation with CO2 has a significantly better environmental footprint, as the neutralisation curve with carbonic acid is much flatter.

This makes it easier to control and monitor the permissible pH value. This method achieves a very stable final pH value and prevents the treated wastewater from becoming overly acidic. Unlike the salts of strong acids, carbonates and hydrogen carbonates are significantly more environmentally friendly. In addition to water discharge from production, this report also records production-specific water consumption (as an ingredient for hyaluronic acid fillers).

The term ‘water consumption’ used until now will be replaced by ‘water withdrawal’ in future. The calculation model for company-wide water consumption, withdrawal and discharge planned for 2025 represents the first step on the path to greater water efficiency.

Metrics and targets

E3-3 Targets related to water and marine resources

In order to reduce negative environmental impacts caused by fresh water consumption at its sole production site and the risk of rising water prices, Croma has voluntarily set itself the goal of reducing production-specific water consumption by 20% by 2030. To achieve this target, the company will draw up a

strategy paper with a clearly defined catalogue of measures by 2026. The starting point is the company-wide water calculation model.

To measure progress towards its water targets, Croma uses the following KPIs: Data on total water withdrawal, production-specific water consumption and discharge, and total water discharge to third parties.

Sustainability Roadmap	Time horizon	Status
Target: Reducing fresh water consumption (per unit produced) in the production process by 20% (base year 2023)	2030	
Milestone		
Drawing up a strategy paper on increasing water efficiency incl. a catalogue of measures	2026	
Measure		
Calculating a model for company-wide water consumption, withdrawal and discharge	2025	

in planning in realisation realised late

E3-4 Water consumption

Croma’s site is not located in an area with high water stress, does not use reclaimed or recycled water, and does not engage in water storage. Therefore, the corresponding values have been set to zero. The table shows the total water withdrawal at the headquarters as determined from the annual statement, as well as the calculated total water consumption and discharge. The calculation of the total production-specific water

consumption corresponds to the amount (m³) of water used for injection purposes in the manufacture of the (bulk) solution. The total production-specific water discharge is calculated on the basis of the grey water returned to the sewage system via the neutralisation tank. Water withdrawal and total ‘Water discharge’ from production increased slightly due to higher production volumes.

Water	2022	2023	2024
Total water withdrawal (m³) ¹	20,588	19,802	20,709
Total water discharge to third parties ²	20,581	19,791	20,698
Water consumption in the production process ²	7	11	11
Water discharge through production process to third parties	6,804	5,639	6,131
Total water consumption in areas of high-water stress	0	0	0
Total water recycled and reused water	0	0	0
Total water stored and changes in the storage	0	0	0

¹ New categorisation of water data into water withdrawal, consumption and discharge
² As the value was collected for the first time in 2024, no year-on-year comparison is possible

E3-5 Anticipated financial effects from water and marine resources-related impacts, risks and opportunities

While the financial impact of ‘Political and legal transition risks’ related to water consumption was rated as insignificant in the short and medium term (1 and

2 to 5 years, respectively), it was rated as medium, i.e. 1-4% of EBITDA, when considering the long-term time horizon (6 to 30 years). The financial impact of ‘Water efficiency measures’ was also insignificant in the short and medium term, but was also rated as medium, i.e. 1-4% of EBITDA, from a long-term perspective.

Resource use and circular economy

The material negative impacts in the area of resource management are, on the one hand, paper and plastic-based packaging materials and, on the other hand, the associated waste. To reduce its ecological footprint, Croma focuses on optimising resource consumption, continuously increasing the purchase of renewable materials and secondary raw materials, and reducing waste volumes and scrap quantities. In order to drive forward resource-specific objectives, environmental issues are centrally managed by the Sustainability & IMS department. The combination of sustainability, IMS and environmental management is crucial to ensuring both operational efficiency and ecological sustainability. The integrated approach optimises internal processes and minimises environmental impact.

Impact, risk and opportunity management
ESRS 2 IRO-1 Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities

When assessing material flows, the entire value chain was considered, taking into account the largest material flows and those most relevant to production. These were then analysed using double materiality to determine their environmental impact and their potential risks and opportunities. Furthermore, local residents were surveyed as part of the stakeholder survey on resources and recycling – this topic ranks among the top three for this stakeholder group. The main technical material groups are plastic (e.g. foiling, packaging, filling material, injection pistons, plastic pallets), glass (syringe bodies) and metal (injection needles). The biological material group includes paper and cardboard (e.g. folding boxes, shipping cartons, leaflet, invoices, wooden pallets) and the filler ingredients (sodium hyaluronate, glycerol, water for injection, disodium phosphate, citric acid).

Various impacts and opportunities were identified in the course of the double materiality analysis. In terms of actual negative impacts, ‘Resource consumption’, particularly with regard to secondary and tertiary packaging, and the associated waste generation (including hazardous waste in the core process and in the downstream value chain, as well as material utilisation) were identified. ‘sustainable product packaging’ (e.g. cost reduction for packaging licences through sustainable and reduced product packaging, reduction in raw material and material costs and increased productivity through more resource-efficient processes) and a ‘Circular product portfolio’ (additional market opportunities and resulting increase in sales) were clearly identified as opportunities. Information on the procedure for conducting the double materiality analysis can be found in the General Disclosures chapter on page 12 et seq.

E5-1 Policies related to resource use and circular economy

With the help of the environmental management system in accordance with ISO 14001, environmental impacts, including resource requirements and waste generation, are identified and monitored. Croma has also developed a waste management concept and a manual for environmental management, including environmental policy, as well as a concept for a circular cosmetics line from its own production. The core of the concept is the material footprint. Product design, energy sources, raw material, material and packaging selection, transport and distribution channels, and product-specific environmental impacts were analysed. The concept also shows how the existing cosmetic product can be converted into a circular product. With the training of a Circular Globe Transformation Coach, the company has also built up in-house expertise in circular economy. Both the waste management concept and the manual are reviewed annually to ensure they are up to date and can be improved. The disposal strategy for chemicals, which ensures that the chemicals used are no longer disposed of together but separately according to chemical type, is about to be implemented. The topic of resources is also addressed in the Code of Conduct for Employees and Business Partners, which is binding for all employees (including affiliates) and business partners. The sustainability strategy also addresses this topic with specific targets that apply to the entire company.

Responsibility for monitoring and evaluating the environmental progress of projects and making any necessary adjustments lies with the Global Director of Sustainability & IMS, who is in constant communication with the company’s Internal Waste Management Officer, the ESG Expert Group and the CFO. The Global Director of Supply Chain Management is responsible for the overall operational management of resource inflows, while the Global Director of Human Resources, whose

department also includes the Waste Management Officer, is responsible for resource outflows. The latter is responsible for the waste management concept and its updating, monitors the correct sorting and disposal of waste types and implements optimisation programmes. Portfolio development is the responsibility of the Global Director Business Development and Strategy. The ESG Steering Committee and the Supervisory Board receive an update on the progress of the projects every six months.

E5-2 Actions and resources related to resource use and circular economy

Several measures have been implemented with regard to the target of ‘Achieving 0% virgin plastic’ in secondary and tertiary packaging (waste hierarchy level: Reuse). On the one hand, the blister cover film for intradermal products has been switched from Tyvek (polyethylene nonwoven fabric) to an environmentally friendly paper. When the product is used, the cover film is removed from the blister pack and then disposed of. Furthermore, the plastic tray containing the botulinum toxin vial has been replaced by a cardboard tray. On the other hand, environmentally friendly bubble wrap made from 100% recycled plastic is now used for shipping goods. According to the product sheet, the new material emits 30% less CO₂ during the manufacturing process, consumes 35% less water and 29% less fossil energy. The project was carried out in cooperation between GSID and Warehouse.

Measures that contribute to the target of ‘0% landfill waste’ (waste hierarchy level: Utilisation) include the switch to a single type of cannula in connection with MDR and MDD, which has already been implemented by Quality Control, the modified media monitoring procedure, the measures currently being implemented for the new disposal strategy for chemicals in the company’s internal laboratory, and the change in the analysis procedure for determining the loss on drying.

Previously, the different item numbers for the cannulas meant that double stock levels were required, which carried the risk of expired cannulas being disposed of. Switching to one type of cannula avoids the need to thermally utilise the expired residual stock. The modified test procedure for media monitoring (60% fewer analyses) means that fewer tests are carried out, which contributes to a significant reduction in the amount of test material required and the associated waste. In accordance with the new chemical disposal strategy, chemicals that were previously disposed of together must now be disposed of in separate canisters. This prevents chemicals that are not harmful to the environment and can be discharged into the sewage system from having to be thermally recycled together with other chemicals such as heavy metal waste, solvents, acidic, toxic or alkaline waste. Phosphorus pentoxide is used in the analysis procedure to determine the loss on drying. The new determination method and the associated reduction in analysis time will reduce the consumption and waste volume of this highly corrosive chemical. Another measure implemented by the waste management officer to promote 0% waste is the recycling of toner material by a partner company. From 2025, the proceeds from the toner collection boxes will be donated to charitable projects. More information on this will follow in the 2025 sustainability report. One project planned for 2025 is the reuse and recycling of syringe trays. Further proof of the efficiency of the measures is the consistently low reject rate of around 3% (discard rate) of filled syringes with rubber stoppers.

The resource efficiency measure already implemented by the labelling and artwork team in the area of product specifications strengthens the circular economy principles within the company and thus makes an indirect contribution to the target of ‘Introducing a circular cosmetics line’ from in-house production (waste hierarchy level: Reuse). In the conventional packaging specification process, documents for regulatory or marketing-specific approval were printed out, which led to high paper consumption. With the new artwork specifications, the documents are countersigned and approved directly via the quality management tool.

Metrics and targets

E5-3 Targets related to resource use and circular economy

The voluntary targets for resource management focus on ‘0% virgin plastic in secondary and tertiary packaging’, promoting circular economy principles within the company through a ‘Circular cosmetics line’, and ‘0% landfill waste’. The latter has already been achieved in the reporting period. According to the waste analysis, significant amounts of waste are only generated in Austria, as the affiliates do not operate any production or packaging facilities or laboratories and the office space is limited. In Austria, all waste was sorted, calculated and either recycled or sent for thermal recovery (no landfill waste). In the next step, the company’s Internal Waste Management Officer, with the support of the waste disposal company, will determine the amount of slag produced by the thermal recycling of hazardous waste. Once the relevant data is available, a possible new target will be reviewed.

Sustainability Roadmap	Time horizon	Status
Target: Achieving 0% landfill waste (HQ): Waste hierarchy level recycling	2025	
Milestone		
Creating a calculation model for company-wide waste by waste type and recycling method	2025	
Measure		
Optimising waste separation system	2025	
Target: Achieving 0% virgin plastic in secondary and tertiary packaging: Waste hierarchy level reuse	2030	
Milestone		
Implementing a research project to increase innovation in the secondary and tertiary packaging	2028	
Measures		
Creating a calculation model for company-wide procurement volume of non-renewable, renewable, recycled, and virgin plastic materials	2026	
Preparing a catalogue of measures to reduce virgin plastic in secondary and tertiary packaging	2025	
Target: Introducing a circular cosmetics line from in-house production: Waste hierarchy level reuse	2030	
Milestones		
Increasing the procurement volume of renewable and recycled secundar and tertiary packaging by 15% increase (base year 2024)	2030	
Increasing EU purchasing volume (raw materials, production, packaging) for in-house production to 90% (base year 2023)	2030	
Launching a pilot project for a circular cosmetics line	2028	
Measures		
Conducting a life cycle analysis for a cosmetic product group	2024	
Developing a concept for a circular cosmetics line from in-house production	2024	

in planning in realisation realised late

The key figures for measuring the effectiveness of measures and target achievement include waste figures by waste type and disposal method, the purchase volume of renewable and non-renewable materials, the purchase volume of recycled and virgin plastic materials, and the completed concept or analysis.

E5-4 Resource inflows

Resource inflows are divided into technical (plastics, glass, metal) and biological materials (paper or cardboard and contents). As the proportion of biological materials from sustainable sources is still being determined, the value is given as 0%. A large proportion of material inflows relates to packaging material, which is divided into primary, secondary and tertiary packaging. Primary packaging in relation to fillers includes materials that come into direct contact with

Resource inflows	2024
Total weight of resource inflows (technical/biological material) (t)	718
Percentage of biological material ¹ (%)	20.1
Total weight of recycled material (t)	63
Percentage of recycled material (%)	8.8

¹ Percentage of material sustainably sourced 0%

E5-5 Resource outflows

The waste streams are classified by the Waste Management Officer together with the contracted waste disposal company according to waste codes and type of recovery (thermal recovery, recycling, biogas production), divided into hazardous and non-hazardous waste and calculated by weight in kilograms. The main waste streams are laboratory waste, chemical residues, packaging material and household waste. The waste materials contained therein range from non-water-polluting pharmaceuticals, chemical residues, acid mixtures and plant trays to paper, cardboard and mixed plastics to commercial waste similar to household waste, grease trap contents and food residues. The majority of waste in Austria is recycled, especially wood, metal and paper. Municipal waste, such as plastic packaging, is incinerated to generate energy. The reduction in the amount of paper-based waste generated in the production of patient information (booklets) is a positive development.

the product, such as the syringe containing the viscoelastic solution.

Folding cartons and blister film are classified as secondary packaging, while cardboard, for example, is classified as tertiary packaging. The data relating to significant resource inputs was calculated based on the quantities purchased in 2024 in terms of weight. As this is the first time this data has been recorded in this form, no year-on-year comparison is available.

In compliance with the Medical Device Regulation (MDR) requirements and the switch to MDR products, the adhesive fold on the existing booklet has now been moved to the wide side. This optimises the use of the raw material and consequently reduces waste at the supplier by 50%.

Due to the nature of Croma products and the non-comparability of their ingredients in terms of durability, reparability and recyclability, no values are reported in this regard. In terms of resource outflows, Croma records the types of waste classified as hazardous and non-hazardous according to disposal type (no waste was sent for preparation for reuse in the reporting year) that are generated directly at the Leobendorf site. Critical raw materials or rare earths are not used and are therefore not contained in the waste. The company is currently unable to track the amount of waste generated and how it is disposed of in the downstream value chain.

While there was a slight increase in hazardous waste compared to the previous year, non-hazardous waste was reduced by 13 tonnes. It is also encouraging that

the proportion of non-recycled waste was reduced by 15 tonnes compared to 2023.

Resource outflows	2022	2023	2024	2022	2023	2024
Type of waste and treatment (t)	Hazardous waste ¹			Non-hazardous waste ²		
Total amount of waste generated	55	47	49	115	135	122
Preparation for reuse	0	0	0	0	0	0
Recycling	0	0	0	56	86	86
Other recovery operations ³	0	0	0	4	5	3
Incineration with energy recovery	55	47	49	55	45	33
Incineration without energy recovery	0	0	0	0	0	0
Landfill	0	0	0	0	0	0
Other disposal operations	0	0	0	0	0	0

¹ Pharmaceuticals, laboratory waste
² Household waste, paper, cardboard, plant trays, plastics
³ Biogas production (grease trap contents, food waste)

Non-recycled waste	2022	2023	2024
Total amount of non-recycled waste (t)	114	100	85
Percentage of non-recycled waste (%)	67.0	53.0	49.5

E5-6 Anticipated financial effects from resource use and circular economy-related impacts, risks and opportunities

Croma can reduce the negative impacts of waste generation and resource consumption by implementing the opportunities offered by ‘Sustainable product packaging’ and ‘Circular product portfolio’, thereby actively contributing to environmental protection. While the financial impact of the opportunity

‘Sustainable product packaging’ is not significant in the short and medium term (1 and 2 to 5 years, respectively), it was assessed as medium, i.e. 1-4% of EBITDA, when considering the long-term time horizon (6 to 30 years). With regard to the opportunity ‘Circular product portfolio’, the financial impact was also insignificant in the short and medium term, but was assessed as high, i.e. 4-10% of EBITDA, from a long-term perspective.

Social

Own workforce | ESRS S1 31

Consumers and end-users | ESRS S4 39

3

GOOD HEALTH AND WELL-BEING

5

GENDER EQUALITY

8

DECENT WORK AND ECONOMIC GROWTH

10

REDUCED INEQUALITIES

In 2024, Croma set a milestone by becoming the first company world-wide to receive MDR approval in the aesthetic field. This significant step underscores the company’s commitment to the highest safety and quality standards and strengthens the trust of end customers and partners alike. MDR certification also enables complete traceability of all components and production steps – an essential basis for responding quickly and precisely when necessary and ensuring customer safety at all times. At the same time, it opens up new opportunities for innovation and sustainable growth in the aesthetic sector.



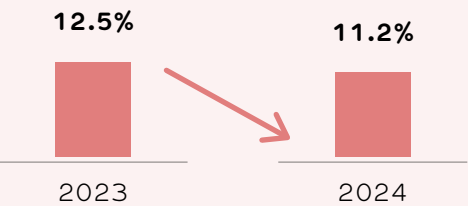
Performance highlights

+ 6%

Increase in the proportion of women at divisional management level to 21.4%

Medical Affairs, Sustainability & IMS and Manufacturing & Engineering are led by women.

Reduction of the gender pay gap



100%

MDR re-authorisation of all existing product groups

Own workforce

Long-term business success isn’t possible without motivated and productive employees – especially in tough economic times. Adherence to fair labour practices and ensuring a positive and healthy working environment are of central importance to Croma. This is because irregularities relating to employee issues not only jeopardise the well-being of the individuals concerned, but also harbour legal risks and damage the company’s image, its attractiveness as an employer, and its staff retention and recruitment. With flexible working time models and home office options, as well as training and health programmes, Croma aims to increase employee satisfaction and secure a stable workforce in the long term.

Strategy
ESRS 2 SBM-2 Interests and views of stakeholders
Information on the integration of the interests, views and rights of its own workforce, including respect for their human rights, into Croma’s strategy and business model is provided in the General Disclosures chapter, ESRS 2 SBM-2 on p. 11 et seq. and on p. 32 et seq.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Croma’s headquarters and production site, as well as its affiliates, are located in Austria and Europe. The company presents itself as an expert organisation. Against this background, no significant risks relating to forced or child labour or human rights violations have been identified (there were no inci-

dents, complaints or serious impacts relating to human rights during the reporting period). Potential health risks may be present for groups of people working in a laboratory or warehouse in Austria who come into contact with hazardous substances. However, in the course of the double materiality analysis, the risk was classified as low due to the extensive occupational safety regulations. Nevertheless, in view of the high importance of occupational safety, the company reports on measures and key figures. Croma’s workforce is covered by the Austrian social security system. These apply in the event of illness, unemployment, accidents at work, parental leave and retirement. In addition, the company offers a voluntary pension scheme from the fourth month of employment and makes a monthly contribution. Employees in the affiliates also have 100% social security coverage and are closely linked to the HR team in Austria.

The ongoing transition plans in the area of environmental and climate protection do not currently have any significant impact on employees, as the implementation of comprehensive and far-reaching measures will take place over the long term. In the course of the double materiality analysis, various impacts, risks and opportunities were identified in relation to the entire workforce in Austria – this includes workers, employees, apprentices and temporary workers.

Impacts
Creation and securing jobs (actual, positive) – With its headquarters in Austria, employment of the local population and the establishment of new sales markets, Croma creates jobs and thus ensures regular and fair salaries.

Work-life balance (actual, positive) – With flexible working time models, flexitime and home office arrangements, and internal and external health services, Croma promotes the well-being of its employees and helps them achieve a better work-life balance.

Building up and securing expertise (actual, positive) – With personal development programmes and internal and external training and further education opportunities, Croma aims to retain core and key personnel and secure expertise.

Non-fulfilment of employment obligation (actual, negative) – Croma currently has a low proportion of employees with disabilities. Due to its failure to fulfil its employment obligation under the Disability Employment Act, the company is required to pay a compensatory tax.

Risks and opportunities
Risks
Staff shortage – Due to the economic situation and associated staff cuts, as well as a sector-specific shortage of skilled workers, work processes may be delayed, which would subsequently result in a decline in sales. Croma is addressing this challenge with targeted measures to retain regular and key staff and strengthen its own economic base.

Personnel costs - The headquarters and production facilities in Austria, the employment of experts, and salary increases in line with the collective agreement for the chemical industry are responsible for the high personnel cost factor. The associated increase in operating costs represents a risk for the company. A comprehensive restructuring programme was launched during the reporting period to reduce this risk.

Opportunities
AI and process automation – With the help of AI and process automation, workflows can be made more time-efficient, administrative and repetitive tasks and data management processes can be simplified, thereby significantly reducing the workload for employees. This can be reflected in a reduction in operating costs. A test phase with a company-specific AI solution is planned for 2025.

Strengthening employee satisfaction – Employee satisfaction is to be enhanced through flexible working time models, proactive employee involvement, the use of feedback channels, efficient communication and an appreciative corporate culture. This has a positive effect on the turnover rate and the associated personnel expenses and can reduce operating costs.

Material impacts, risks and opportunities

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Material impacts, risks and opportunities								
Own workforce								
Working conditions - Secure employment								
Creating and securing jobs	Actual positive impact			●			●	●
Working conditions - Working time								
Staff shortage	Risk	Financial impact Sales		●		●		
AI and process automation	Opportunity	Financial impact Operating costs		●			●	●
Working conditions – Adequate wages								
Personnel costs	Risk	Financial impact Operating costs		●		●	●	
Working conditions – Work-life balance								
Work-life balance	Actual positive impact			●			●	●
Strengthening employee satisfaction	Opportunity	Financial impact Operating costs		●			●	●
Equal treatment and opportunities for all – Training and skills development								
Building up and securing expertise	Actual positive impact			●			●	●
Equal treatment and opportunities for all – Employment and inclusion of persons with disabilities								
Non-fulfilment of employment obligation	Actual negative impact			●		●		

Impact, risk and opportunity management

S1-1 Policies related to own workforce

As a pharmaceutical company, Croma is not exposed to any risk of human trafficking, forced labour or child labour. Human rights issues in general are covered in the Code of Conduct for Employees in a separate section entitled ‘Commitment to Human Rights’ and are integrated into the sustainability strategy and its objectives in the section ‘Own Employees’ (see Sustainability Roadmap table on page 34). The Code of Conduct is part of the employment contract and, like the sustainability strategy, is published on the intranet, on GSID SharePoint and on the website. The company is committed to complying with the ten principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights. Croma is also a member of respACT, Austria’s leading corporate platform for sustainable business, and the UN Global Compact.

The mandatory Code of Conduct has been offered since the beginning of 2025 in the form of bilingual training courses (German and English), which all employees must complete annually. As part of this commitment, Croma does not tolerate any discrimination based on origin, skin colour, religion, gender, national origin, age, disability, sexual orientation, gender identity or expression, or any other legally protected basis. In addition, conflict management guidelines have been issued, such as the anti-bullying guidelines and performance appraisals in line with Croma’s values. Additional information on complaint management in relation to discrimination can be found in section S1-3 on page 33. Croma has established a management system and implemented a training and development programme in the area of occupational safety. The Family and Career Certification confirms

the effectiveness of the HR strategy. The health and safety of employees is ensured by the internal management system, a prevention strategy, comprehensive safety training and a range of health services. The associated emergency and standby plans, as well as work-specific laws such as the Employee Protection Act and the Labour Inspection Act, cover 100% of employees and temporary workers. The office building is fully accessible. As strict safety and hygiene regulations, e.g. changing shoes, are mandatory in production and packaging, wheelchairs cannot be used in these areas.

Decisions regarding the workforce – including those relating to equal treatment and equal opportunities – are first made at management level and then implemented at operational level. Responsibility for managing the impacts, risks and opportunities and for developing optimisation measures lies with the Head of HR, who reports to the CFO. Together with other departments relevant to employment, it reviews the current status quo and the achievement of targets using key performance indicators such as the turnover rate, training figures, the proportion of women, the gender pay gap and employer ratings. Cross-divisional monthly meetings with the ESG Expert Group ensure an efficient exchange of information. Progress reports on ongoing projects are submitted to the CFO and, if necessary, the measures implemented are updated. In addition, HR topics with a sustainability background are also discussed at the half-yearly ESG Steering Committees and presented to the Supervisory Board. The company’s internal Safety Officer coordinates occupational health and safety together with the occupational physician and the Human Resources Department and chairs the half-yearly occupational safety committee meetings.

S1-2 Processes for engaging with own workers and workers’ representatives about impacts

Croma offers its employees various opportunities to interact on company issues. These range from feedback meetings as part of the onboarding and offboarding process and the performance management process (270° feedback) to conflict management meetings. The results of these processes are clustered by topic and evaluated. If necessary, appropriate adjustment measures are implemented, the effectiveness of which is measured through observations, feedback and indicators. A stakeholder survey was conducted at the beginning of 2025, which also included a specific question about people with disabilities. HR KPIs are tracked monthly by the Executive Vice President (EVP) HR and presented at Corporate Management Meetings.

Approximately ten weeks after starting work, new employees have a feedback meeting with their manager and the person responsible for personnel development. The meeting focuses on aspects such as cooperation with the manager, the status of induction, integration into the new team and satisfaction with the position. Particular emphasis is placed on the potential for improvement identified by the new employee. The meeting is recorded in the HR management system and signed by the employee and the manager. In the event of termination, the employee is offered a voluntary offboarding meeting, which is conducted using a structured form. Among other things, the reasons for leaving, the cooperation with colleagues and the manager, and the recommendation rate are analysed. The information is incorporated into department-specific statistics and evaluations. After the employee leaves, the manager receives the evaluation results regarding the cooperation.

In the event of conflicts, confidential discussions are held with the parties involved as necessary with the aim of developing a solution. These discussions can be initiated by the employee themselves, the Works Council or the manager. In this case, too, the discussions are moderated and minuted by the HR department and made available to the persons concerned. Ideally, the conflict will be resolved through conflict mediation. However, it may also result in a warning (a corresponding warning process is in place), which includes a monitoring period to enable further cooperation.

S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns

Taking employee concerns into account is an important factor in employee satisfaction. It is therefore important to receive information early and regularly on issues that need improvement or are not compliant. The points of contact are the Occupational Safety Officer, the occupational physician, the Works Council and the HR department. Employees have the opportunity to contact the HR department in person or virtually, or to report their complaints, praise, suggestions and concerns via an anonymous feedback box. These are available both as a digital tool and in paper form via a drop box. The concerns are processed by the HR department, communicated via the intranet and presented in online meetings, including the respective processing results. As an accompanying measure, Croma has set up another point of contact: Concerns can also be raised anonymously via the company-wide whistleblower system, which is accessible via the intranet and the website. The channels are regularly reviewed for effectiveness by HR experts based on the number of reports and surveys, as well as the number of cases that have been resolved positively. Further awareness measures includes Code of Conduct train-

ing and performance appraisals based on Croma’s values. The Chamber of Labour and trade unions act as external contact points for employees in Austria in connection with negative impacts. Information on the Croma whistleblowing system can be found in the Business Conduct chapter under G1-1 on page 45.

S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Measures relating to ‘Job creation and security’ include employing local people – this also applies to affiliates in Europe – implementing in-house methods, establishing new sales markets (US) and the associated company growth, and paying fair salaries on a regular basis. The range of measures already implemented in relation to ‘Work-life balance’ measures extends from flexible, individual and family-friendly working time models and a home office policy to a company-owned fitness room. In addition, the site offers medical advice and vaccination services and an external employee assistance programme with health experts to promote the mental and physical health of employees. To avoid overtime, awareness is raised through automated reminders when the maximum working time is reached, with mandatory approval by the manager. In addition, employees with all-in contracts have had the option of taking six days of time off in lieu since 2024. The catalogue of measures for ‘Building up and securing expertise’ ranges from personal development opportunities to internal and external training and further education programmes and a knowledge retention programme. The latter is part of the performance management processes and serves to maintain, build and secure expertise. Successes have been achieved with

the management training course and the leadership development programme. A comprehensive catalogue of measures has been put together to achieve the target of becoming a top employer. Croma has a low proportion of employees with disabilities. As a first step, a survey was conducted to determine how many people in the company belong to the group of people with disabilities. The next step is to draw up a catalogue of measures under the leadership of the EVP HR to increase the proportion of people with disabilities in the company. Croma counteracts the risk of ‘staff shortages’ with measures to retain core and key personnel, increase innovation potential and strengthen its economic base. To this end, Croma offers development opportunities, sound talent management, a mentoring programme, training, further education and personal development opportunities, conscious use of diversity and a knowledge retention programme.

Croma is addressing the ‘Personnel cost’ risk with a comprehensive restructuring programme. Risks relating to its own workforce have been tracked by Corporate Risk Management since 2024 and are monitored and reassessed annually by the Corporate Risk Manager and division-specific risk owners.

Croma has already taken the first steps towards realising the opportunity presented by ‘AI and process automation’. Selected departments have already worked independently with different AI models and tested their potential. At the beginning of 2025, mandatory AI skills training was conducted for all employees in collaboration with an external partner to create a common understanding of the responsible use of AI and to make opportunities and risks transparent. A test phase with a company-specific AI solution is planned for 2025. The opportunity of ‘Employee satisfaction’ is to

be strengthened with flexible working time models, the proactive involvement of employees through surveys and the possibility of using feedback channels and the works council. In addition to team-building measures, Croma offers an environment characterised by efficient communication and an appreciative corporate culture. The catalogue of measures also includes topic-specific awareness campaigns and campaigns in the context of Croma’s values, as well as employee information in the form of virtual meetings. Starting in 2025, a sustainability-specific newsletter on the three dimensions of sustainability will be sent out regularly. With the help of feedback via the feedback box, reports to the Works Council, survey results, personnel and financial indicators, and analysis of the AI test phase, the effectiveness of the measures taken is regularly reviewed by the relevant experts, i.e. on a monthly or annual basis depending on the topic, and presented to the relevant committee.

Metrics and targets

S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The HR targets of the sustainability strategy were developed in the ESG Expert Group with the participation of the Works Council based on the results of the materiality analysis and aligned with the evaluation of the employee survey at the beginning of 2025. Their relevance was confirmed. The company wants to boost its appeal as an employer and has set clear targets to do so.

The company uses the gender pay gap, the proportion of women in top management, diversity figures for each management level, sick leave figures, overtime trends, turnover rates, accident figures and successfully completed certifications as key performance indicators to measure its targets.

Sustainability Roadmap	Time horizon	Status
Target: Be nominated as a top Austrian employer	2026	
Milestones		
Increasing average number of training courses per employee by 20% (base year 2023: 17 h)	2026	
Reducing turnover rate to 8.5% (base year 2023: 18.1%)	2026	
Increasing proportion of women in top management ¹ by 100% (base year 2023: 15.4%)	2026	
Eliminating the gender pay gap	2026	
Keeping absenteeism rate ² constantly under 5%	2025	
Keeping performance review meetings at 100%	2025	
Maintaining a company rating on Kununu of at least 3 points	2025	
Measures		
Achieving ISO 45001 certification	2026	
Implementing age and generational management	2025	
Implementing workplace health promotion	2025	
Developing equity, equality, diversity and inclusion strategy	2025	
Developing and implementing an accident prevention strategy	2025	
Achieving work and family certification	2024	

¹ Top management: Divisional management and Executive Vice Presidents

² Absenteeism rate due to sick leave

in planning

in realisation

realised

late



S1-6 Characteristics of the undertaking’s employees

Employee-specific parameters such as age, gender, type of employment, classification, and start and end dates are recorded digitally by the Human Resources department. Changes to personal data are reported by the employee to the Human Resources department.

The number of employees (workers and employees) declined sharply year-on-year due to the comprehensive restructuring programme, which is also reflected in the turnover rate. A detailed overview of the workforce and year-on-year changes can be found in the following tables.

Employees	2022	2023	2024
Total employees	438	415	373
Total male employees	176	179	167
Permanent male employees	175	178	165
Temporary male employees	1	1	2
Male employees without guaranteed working hours	0	0	0
Full-time male employees	159	163	139
Part-time male employees	17	16	28
Total female employees	262	236	206
Permanent female employees	260	234	204
Temporary female employees	2	2	2
Female employees without guaranteed working hours	0	0	0
Full-time female employees	192	168	133
Part-time female employees	70	68	73

Number of employees: as at 31 December

Departures and turnover rate	2022	2023	2024
Total departures¹	61	75	72
Male employees leaving the company	19	27	30
Female employees leaving the company	42	48	42
Total turnover rate (%)	13.9	18.1	19.3
Male employee turnover rate (%)	10.8	15.1	18.0
Female employee turnover rate (%)	16.0	20.3	20.4

¹ Calculation basis for year-round employees (workers and employees)

S1-7 Characteristics of non-employee workers in the undertaking’s own workforce

In the event of a lack of in-house expertise or staff shortages, the company draws on temporary workers. One person was employed by Croma on the basis of a contract for work respectively a freelance contract in 2024. The number of temporary workers rose to five in the reporting period (2023:3).

S1-8 Collective bargaining coverage and social dialogue

100% of the Austrian workforce is represented by employee representatives and is subject to the collective agreement for the chemical industry, regardless of whether they are white-collar or blue-collar employees. All affiliates – where fewer than 50 people are employed, i.e. less than 10% of the total work force – are located in Europe.

This ensures that this group of people also receives appropriate remuneration. The Works Councils for workers and employees are elected for a term of five years. They can be contacted on all work-related issues and are subject to confidentiality obligations. To ensure that everyone is up to date on employee issues, monthly Corporate Management Meetings (CMM) are held under the leadership of the Executive Vice President HR and with the participation of the Works Council. In addition to having the highest operational responsibility for employee involvement, the EVP HR is also a member of the Strategic Leadership Team, which is in regular contact with the Executive Team. Ad hoc meetings are scheduled for special topics.

S1-9 Diversity metrics

Due to its international business activities, the diversity of its employees is a key factor in Croma’s success. Employees can bring their individuality, different mentalities and cultures to their work. Diversity parameters are stored in the HR tool and can be

evaluated based on the different management levels. During the reporting period, the proportion of women in middle management increased to 21.4% (2023: 15.4%) and in lower management to 48.4% (2023: 43.6%).

Diversity by management level	2023	2024
Men Executive Board	4	2
Women Executive Board	0	0
Men Executive Board (%)	100.0	100.0
Women Executive Board (%)	0.0	0.0
Members Executive Board under the age of 30 years (%)	0.0	0.0
Members Executive Board aged 30-50 years (%)	25.0	50.0
Members Executive Board over the age of 50 years (%)	75.0	50.0
Male employees at middle management level (%)	84.6	78.6
Female employees at middle management level (%)	15.4	21.4
Middle management level under the age of 30 years (%)	0.0	0.0
Middle management level aged 30-50 years (%)	62.5	58.3
Middle management level over the age of 50 years (%)	37.5	41.7
Male employees at lower management level (%)	56.4	51.6
Female employees at lower management level (%)	43.6	48.4
Lower management level under the age of 30 years (%)	7.7	4.7
Lower management level aged 30-50 years (%)	76.9	81.3
Lower management level over the age of 50 years (%)	17.9	14.1
Male employees at non-management level (%)	38.2	41.4
Female employees at non-management level (%)	61.9	58.6
Non-management level under the age of 30 years (%)	16.3	14.2
Non-management level aged 30-50 years (%)	69.9	61.0
Non-management level over the age of 50 years (%)	13.9	24.8

Number of employees: as at 31 December
Executive Board (upper management level), divisional management (middle management level), department and team management (lower management level)



S1-10 Adequate wages

Adequate wages for employees are guaranteed by the collective agreement for the chemical industry. Salaries are calculated based on the classification of the activities specified in the job description. A competitive remuneration structure is ensured through regular analyses and industry benchmarks, which enable a comparison between internal and market-specific requirements. Depending on qualifications, Croma also pays additional remuneration. Changes to the salary structure are made through collective bargaining or employee representatives.

S1-12 Persons with disabilities

According to Austrian law, companies with more than 25 employees are required to hire one person with a disability for every 25 employees. Croma has not met the required quota for 2024 – the figure rose from 1.4% in 2023 to 1.6% in 2024 – and is therefore paying a compensation tax to the Federal Social Welfare Office.

Persons with disabilities	2022	2023	2024
Total persons with disabilities (%)	0.9	1.4	1.6
Male employees with disabilities (%)	0.2	0.2	0.5
Female employees with disabilities (%)	0.7	1.1	1.1

Number of employees: as at 31 December

S1-13 Training and skills development metrics

Employee development and knowledge retention are key success factors for Croma. HR experts use a competency model to assess the need for personnel development measures. This model is based on Croma’s values, the mission statements for specialists and managers, and the specific requirements of the

respective department. The restructuring that took place during the reporting period resulted in restrictions in the availability of personnel and resources, which is reflected in a reduction in the number of training hours and skills development discussions held.



Trainings	2023	2024
Total training hours by gender	7,207	4,532
Male employees	2,883	2,566
Female employees	4,324	1,966
Total average training hours by gender	17	12
Male employees	16	15
Female employees	18	10

Number of employees: as at 31 December

Skills development	2023	2024
Total skills development interviews ¹ by gender	45	13
Male employees	17	1
Female employees	28	12
Percentage of skills development interviews by gender total (%)	100.0	100.0
Male employees (%)	38.0	7.7
Female employees (%)	62.0	92.3
Total skills development interviews by management level	45	13
Upper management level	2	0
Middle management level	2	0
Lower management level	19	3
Non-management level	22	10
Percentage of skills development interviews by management level total (%)	100.0	100.0
Upper management level (%)	4.4	0.0
Middle management level (%)	4.4	0.0
Lower management level (%)	42.2	23.1
Non-management level (%)	48.9	76.9

¹ Calculation basis: Year-round employees and number of interviews conducted

S1-14 Health and safety metrics

The Austrian Employee Protection Act, which regulates obligations and rights in connection with safety and health protection measures in the workplace, covers 100% of the workforce, as does the occupational safety management system. Croma’s health and safety management system includes a wide range of safety training courses, ranging from the safe handling of chemicals and equipment/machinery to fire safety instructions and the correct use of the TOTMANN mobile phone (functional personal emergency signal function for lone workers) or working on roofs. The relevant evidence is collected and kept by the occupational safety specialist. Instructions are also provided for manual work carried out by external companies on the company premises. The safety specialist carries out regular inspections to identify and assess hazards. This includes checking ladders, climbing aids and fall protection devices.

The relevant results are documented in an inspection report. One preventive occupational safety measure is the reporting of situation and work-related hazards, which is mandatory for all employees. The identified deficiencies are recorded using process management software and must be rectified by the responsible person within a set period of time. Accidents and near misses must be reported to the Safety Officer. The corresponding figures and the Lost Time Incident Rate (LTIR) are then listed. The latter is an important control variable and reflects a company’s occupational safety performance. Last year, there were no fatal accidents at work or work-related illnesses that had to be reported. The LTIR value rose slightly from 3.2 in 2023 to 3.5 in 2024 (due to the lower number of working hours). The number of accidents remained unchanged at two. The number of days lost fell to 20 in the reporting period (2023: 80 days), which is related to the reduced severity of accidents.

Health protection and safety	2022	2023	2024
Percentage of employees ¹ covered by a health and safety management system (%)	100.0	100.0	100.0
Fatalities due to work-related injuries	0	0	0
Fatalities due to work-related illnesses	0	0	0
Reportable occupational accidents	3	2	2
Lost Time ² Incident ³ Rate (LTIR)	4.9	3.2	3.5
Reportable work-related illnesses	0	0	0
Days lost (due to work-related injuries, deaths, accidents or illnesses)	23	82	20

¹ Calculation basis year-round employees
² Calculation rate based on 1 million hours worked
³ Calculation of accidents at work with at least one day's absence without privately caused commuting accidents

S1-15 Work-life balance metrics

The right to care leave for the care of children or relatives living in the household is regulated by law in Austria, generally amounts to one week per year (equivalent to the weekly working time) and applies

to 100% of employees. For children under the age of twelve who require care, there is the option of extended care leave of one week. The percentage of family-related leave rose from 23% in 2023 to 28.7% in 2024.

Care leave	2022	2023	2024
Percentage of employees entitled to leave for family reasons ¹ (%)	100.0	100.0	100.0
Percentage of employees who have taken leave for family reasons total	19.0	23.0	28.7
Utilisation by male employees (%)	8.0	11.0	12.6
Utilisation by female employees (%)	11.0	12.0	16.1

¹ Calculation basis year-round employees

S1-16 Remuneration metrics (pay gap and total remuneration)

To ensure a comparable remuneration structure between female and male employees, Croma regularly conducts a gender pay gap analysis. The unadjusted gender pay gap (calculated on a full-time basis)

decreased to 11.2% in the reporting period, compared to 12.5% in 2023. The ratio between the total annual remuneration of the highest-paid individual and the median remuneration of employees rose from 3.6 to 3.9.

Consumers and end-users

Although the pharmaceutical industry is strictly governed by numerous regulations and controls, risks to the health and safety of consumers and end users cannot be completely ruled out. This makes it all the more important to counteract these risks with a clearly defined duty of care. Improper treatment or misleading product information can not only have negative consequences for patients, but also result in legal consequences for the company and damage its brand image. Through targeted strategies and measures, Croma aims to strengthen positive effects, exploit opportunities and minimise risks at the same time.

Strategy
ESRS 2 SBM-2 Interests and views of stakeholders
Information on how the interests, views and rights of consumers and/or end users are taken into account in Croma’s sustainability strategy and business model is provided in the General Disclosures chapter on page 11.

ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
The consumers and/or end users of Croma are individuals who undergo medical treatment or use skin care products. The main effects relate to improving the mental and physical health of this target group, particularly through treatment with hyaluronic acid products. In order to act responsibly, they require accurate, product-specific information and ethically acceptable advertising campaigns. Since medically performed treatments (downstream value chain) are minimally invasive or surgical procedures, the risk of

harm to patients is significantly higher than for consumers of skin care products. In the course of the double materiality analysis, the following significant impacts, risks and opportunities were identified with a focus on the stakeholder group ‘patients’.

Impacts
Mental wellbeing (actual, positive) – With its extensive range of products for minimally invasive or reconstructive treatments and targeted training on correct product use, Croma contributes to improved patient well-being. With its comprehensive training and education programme for healthcare providers, Croma aims to achieve natural results through treatment.

Alleviation of physical limitations (actual, positive) – Hyaluronic acid injections can help eliminate visual impairments (cataract surgery) and alleviate orthopaedic complaints such as joint pain (hyaluronic acid therapy for joint diseases). Croma ensures high product quality through extensive and strict quality controls.

Risks and opportunities
Risks
Criminal proceedings due to misleading information – Inconsistent or unclear labelling can lead to injury to patients or health complications when the product is used and, last but not least, to criminal proceedings due to non-compliance with the Medical Devices Regulation. Furthermore, misleading or insufficient information can lead to wrong decisions on the part of the patient and have a negative impact on trust in the company and brand reputation. Croma reduces this risk by having the labelling texts created and checked by technical experts. In addition, these are also checked as part of product certification.

Criminal proceedings due to health impairments – Improper handling or damaged products can lead to health impairments that cannot be remedied immediately – and in the worst case, even result in criminal proceedings. Croma addresses this risk with a comprehensive training and education programme aimed at the highest quality and safety standards.

Opportunities
Strengthening customer satisfaction – The high product quality and safety confirmed by clinical studies and product testing by internationally recognised notified bodies such as TÜV strengthens customer satisfaction, as does the approval of the hyaluronic acid filler series under MDR. Ethical marketing practices, comprehensive training and consulting services, and a focus on a more environmentally friendly and recyclable product range can also lead to increased sales.



Material impacts, risks and opportunities

			Relevance in the value chain			Time horizon		
			Upstream	Core process	Downstream	Short term	Medium term	Long term
Consumers and end-users								
Information-related impacts for consumers and/or end-users - Access to (quality) information								
Criminal proceedings due to misleading information	Risk	Financial impact Investment costs		●	●	●	●	●
Personal safety of consumers and/or end-users - Health and safety								
Mental well-being	Actual positive impact				●	●	●	●
Alleviation of physical limitations	Actual positive impact				●	●	●	●
Criminal proceedings due to health pairments	Risk	Financial impact Investment costs		●	●	●	●	●
Strengthening customer satisfaction	Opportunity	Financial impact Sales		●	●	●	●	●

Impact, risk and opportunity management

S4-1 Policies related to consumers and end-users

The sustainability strategy forms the basis for efficient management of risks and opportunities, particularly in the section on consumers and end-users. In addition, the two Codes of Conduct provide information and guidance for employees and business partners in the areas of product quality and patient safety. Human rights aspects relating to consumers and/or end-users were not considered material – there were 0 reported human rights violations in the reporting period. Both concepts are aimed at Croma’s key stakeholders as well as consumers and end-users

throughout the value chain and cover all countries to which the company supplies its products. Croma is committed to complying with the principles of the UN Global Compact and the United Nations Guiding Principles on Business and Human Rights and also requires third parties to comply with these principles through its Code of Conduct, which is binding on business partners. During the reporting period, there were 0 cases of non-compliance with the guiding principles. As Croma has no direct contact with patients, with the exception of clinical trials, communication takes place via healthcare professionals and a medical information service.

The practice management tool for doctors (CliniCore), a comprehensive consulting service and specific training courses provide support in managing the identified impacts and opportunities. Increased efforts towards ethical marketing also contribute to this. High product safety and quality are also ensured by intensive clinical studies, our own Research and Development Department, a quality management system established in accordance with ISO 13485, and strict product testing by health authorities and the Notified Body TÜV. Furthermore, the company is committed to developing more environmentally friendly products.

Depending on the topic, the main responsibility for operational implementation and evaluation of the set targets lies with the Quality Unit, Medical Affairs, the Regulatory Affairs Department and Research and Development. Those responsible are supported by the Sustainability & IMS Department, which handles the agenda in the ESG Expert Group and coordinates with the Executive Board, which also has overall responsibility for the sustainability strategy. Updates on the progress of projects or necessary adjustments are presented to the ESG Steering Committee.

S4-2 Processes for engaging with consumers and end-users about impacts

Direct patient contact occurs exclusively within the context of clinical trials. The participating patients act as proxy end-users, so to speak. Croma therefore obtains long-term, patient-related information exclusively from the treating healthcare providers, with whom it maintains very close and regular contact. At the beginning of 2025, the relevant stakeholder group was also surveyed on sustainability-specific topics, which were specified by the Global Commercial and the Global Medical Director. With regard to its key stakeholders, the company has developed a stakeholder engagement plan to ensure that infor-

mation relevant to the company, including information relating to sustainability issues, is shared between key stakeholders as promptly as possible. This process is reviewed annually and adjusted as necessary. In addition, impacts, particularly with regard to product quality and patient satisfaction, are recorded directly from participants in the clinical studies conducted in advance. The experience of the contracted healthcare providers is another tool for measuring patient satisfaction.

S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

Any undesirable results associated with treatment are discussed directly between the patient and the doctor responsible and, where possible, remedied immediately. Croma has a comprehensive system for safety monitoring and risk management in the product area. Product-specific complaints or reports from patients or healthcare providers are recorded by a medical information service. The relevant information is collected in databases, reviewed and evaluated. Symptoms or effects that were not assessed in the risk analysis are investigated in detail. If necessary, appropriate countermeasures are initiated, which may include product withdrawal. Contact information can be found in the package insert, on the Croma website (pharmacovigilance@croma.at, complaint@croma.at) and via the relevant national health authorities. Complaints relating to pharmaceuticals are handled by the Pharmacovigilance Department using specific complaint procedures. To ensure the effectiveness of the complaint system, all Croma employees and their distribution partners must complete annual refresher training courses. These can be conducted in person or via the training tool. During the reporting period, 100% of the affected groups completed the training. This is to ensure that

all reports are forwarded to the responsible team for processing. The establishment of such processes and compliance with them are reviewed and evaluated during audits or inspections carried out by third parties. Reports relating to medical devices, such as fillers and skin care products, are handled by the Quality Assurance & Compliance department. The reports are categorised by product group and general topic and evaluated on the basis of product performance. The evaluation is carried out every six months and includes an analysis of the number of product-specific complaints in relation to sales figures and a trend observation. In addition, process performance measurements are carried out, including the processing time for complaints, which should be kept as short as possible. During the reporting period, around 370 complaints were registered and processed in the medical devices and skin care products (manufacturing and distribution) area.

Concerns about misconduct in connection with the Croma values or the Code of Conduct can be reported using the whistleblower system.



S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions

Applications in the aesthetic field are carried out after detailed consultations by healthcare providers who are trained by Croma in the correct use of the products. To increase patient safety, health and satisfaction and to ensure product quality, Croma offers a comprehensive training programme for doctors, which will also include ESG aspects in the future. In addition, all existing product groups were converted from the previously valid medical device process to the new Medical Device Regulation (MDR) in 2024. MDR approval not only ensures product quality and safety, but also prevents malfunctions. This stops unsafe products from entering the market. Continuous monitoring and traceability of medical devices also prevents further damage. Any problems that arise are reported directly to Croma via the healthcare provider, the medical information service and the contact addresses, and are dealt with by the relevant departments. Extensive and robust quality controls throughout the entire product life cycle also ensure that patients receive high-quality products and accurate product information. The comprehensive training and continuing education programme for healthcare providers, developed by the Customer Experience Division, is designed to ensure correct

product handling and treatment methods. This should contribute to optimal treatment results and improved physical and mental well-being for patients. The programme includes specialist lectures and workshops on product properties, live demonstrations and hands-on workshops where customers can perform some of the treatments themselves under expert guidance. Croma also offers anatomy workshops where the anatomical structures essential for the treatment of the products are analysed using anatomical specimens. In addition, Croma offers its own webinars on the topics listed. The effectiveness of the training courses is evaluated on the basis of the number of training courses and participants. The continuous development of products and the assurance of ethical marketing practices with the help of guidelines are intended to further increase customer satisfaction.

The labelling texts are written by qualified experts from Product Development, Clinical Operations, Medical Writing, Product Management, Risk Management and Regulatory Affairs, and are checked against the contents of the technical documentation. These texts are also prepared in accordance with the latest legal requirements from directives, regulations, standards and guidance. As part of the medical device certification process, the entire labelling content is additionally checked for completeness, accuracy and, above all, in the interests of patient safety.

Metrics and targets

S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

The target development process is based on the results of the materiality analysis, which were confirmed by a survey of doctors acting as patient representatives. Further involvement takes place on the basis of a specific stakeholder engagement plan. The tracking of targets and possible improvements are communicated in the annual Sustainability Report. The

targets, milestones and measures relating to consumers and end users, as well as the respective status quo and time frame, are shown in the table below.

The success of target achievement and measure implementation is assessed using specific key performance indicators. These include the number of sustainable and newly approved product groups produced, as well as the total number of ESG training courses and screenings carried out.

Sustainability Roadmap	Time horizon	Status
Target: Re-authorising all existing product groups under MDR	2024	●
Milestone		
Achieving MDR re-authorisation of all dermal fillers (100%)	2024	●
Measure		
Redrafting all technical dossiers by product group, submission and implementation of the assessment procedures	2024	●
Target: Implementing screening for all marketing campaigns according to ethical marketing principles	2026	○
Milestone		
Developing screening parameters for ethical marketing	2025	○
Measures		
Integrating ESG into external training programme	2025	○
Developing a guideline for ethical marketing	2025	○

○

 in planning

◐

 in realisation

●

 realised

◑

 late



Business conduct

Business conduct
| ESRS G1

44



Through the targeted procurement of raw materials and other materials from the region and from Europe, Croma makes an important contribution to regional value creation. During the reporting period, an impressive 89.2% of raw materials for manufacturing and packaging were sourced from Europe. With this clear commitment to regional resources, Croma not only strengthens local economic cycles and communities, but also promotes sustainable partnerships and reduces its ecological footprint through shorter transport routes.



Performance Highlights

ISO 31000

With the introduction of **corporate risk management** in accordance with ISO 31000, Croma is setting new standards in sustainable risk management with a focus on ESG.



Mandatory **Code of Conduct training programme** created with effectiveness check.

89.2%

of the raw materials for **production and packaging** are sourced from Europe.

Business conduct

Ethical corporate governance not only strengthens stakeholder relationships, but also enhances the company’s image, the resilience of its business model and its profitability. It also helps to minimise risk. Croma’s business practices comply with the relevant country-specific legislation and are in line with international ethical standards and the company’s specific values of cooperation, reliability, openness, purpose and goal achievement. The latter also form the basis for the Code of Conduct for Employees and Business Partners. Strategies, guidelines, processes and training promote fair and legally compliant operating and business practices along the entire value chain.

Governance
ESRS 2 GOV-1 The role of the administrative, supervisory and management bodies
Information on the role of the administrative, management and supervisory bodies in relation to business conduct and the relevant expertise is provided in the General Disclosures chapter on page 7 et seq.

Impact, risk and opportunity management
ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities
The assessment and determination of impacts, risks and opportunities covered the entire value chain and was carried out using a double materiality analysis and an online survey. As no donations were made and no lobbying was carried out, the ESRS topic area of political influence and lobbying was not considered material. One actual positive impact identified was ‘Positive corporate culture’. By actively integrating Croma’s values into everyday work and through appropriate communication measures, which include the Croma sustainability strategy, the ESG communication launched in 2024 and the Code of Conduct training programme, the company is strengthening

both its corporate culture and its ESG performance. On the other hand, ‘Regional value creation’ was classified as material. By purchasing raw materials and other materials primarily from the region or from Europe, employing local people and paying taxes directly, Croma contributes to the financing capability of countries and to regional value creation. During the reporting period, 89.19% of the raw materials for manufacturing and packaging were sourced from Europe. One actual negative impact is ‘Causing animal suffering’ in the upstream value chain. The impairment of animal welfare results from animal testing that is not medically necessary in the upstream value chain. Currently, Croma’s influence on the manufacturer from whom it is dependent is too small to bring about change. It is therefore all the more important that, in the event of animal testing being absolutely necessary, the company works with external laboratories that either have AAALAC (Association for Assessment and Accreditation of Laboratory Animal Care International) accreditation or meet even more extensive animal welfare requirements in accordance with the Austrian Animal Welfare Law.

‘Inadequate compliance management’ was cited as a risk. Inefficient compliance management, incomplete audits or the lack of centralised monitoring in the form of a legal register increase the risk of penalties or lawsuits due to non-compliance with regulatory requirements and the implementation of binding obligations. To reduce this risk, Croma 2024 has taken initial steps to introduce a compliance web tool with an internal monitoring function via the Legal Department. Implementation is planned for 2025. Another risk is ‘Insufficient integration of corporate management systems’. Management systems that are not fully integrated or the lack of corporate management systems lead to additional costs and increased effort. In addition, there is a risk that ESG risks will not be identified or that only incomplete information will be available when important business decisions are made. To reduce this risk, Croma has launched the introduction of corporate risk management in accordance with ISO 31000 and an IMS pilot project on supplier qualification management in 2024. ‘Cybercrime’ has also been identified as a risk. Inadequate cyber security measures pose an increased cost risk and harbour the danger of data breaches and privacy violations. To reduce this risk, Croma has implemented an IT security policy and a modern security solution that protects end devices from cyber threats. The introduction of a security information and event management system and the establishment of a security operations centre are planned for 2025. The final risk is ‘Economic crisis’. Economic downturns and budget-related delays in further development projects can lead to competitive disadvantages. To reduce this risk, Croma launched a comprehensive restructuring and process optimisation programme in 2024 and laid the foundation for corporate risk management in accordance with ISO 31000. In addition, a KPI dashboard was introduced to measure corporate targets more effectively.

‘Sustainability management’ was identified as a significant opportunity. Croma’s sustainability strategy strengthens the company’s resilience and business model in the long term. Successful participation in ESG ratings contributes to improving conditions on the capital market. The format of the ideas workshop, which has been expanded to include an ESG focus, promotes innovation potential, improves the company’s environmental footprint and saves resources. As part of the expansion of the product and service portfolio with a focus on sustainability and the introduction of recognised sustainability labels, a concept for a circular cosmetic product with a corresponding life cycle analysis was developed in 2024. ‘Sustainable supply chains’ were also identified as a relevant opportunity. To promote stable and sustainable supply chains, Croma focuses its procurement on regional, European suppliers and alternative providers. In addition, ESG screenings of business partners are carried out and supplier controls are being strengthened. The standardisation of the ESG rating process and the start of supplier audits will be carried out according to risk groups and is planned for 2025. ‘AI and process automation’ represent another significant opportunity. The use of artificial intelligence and process automation can make administrative tasks and data management processes more efficient, simplify processes and reduce working hours. During the reporting period, Croma tested the support potential of artificial intelligence by having different departments work independently with various AI models. A test phase with a company-specific AI solution is planned for 2025. To this end, the areas in which there is a need for AI-supported processes will be systematically identified in advance. The goal is to establish a uniform, cross-divisional AI platform. Stakeholder engagement was identified as the last significant opportunity in terms of business conduct. With its own stakeholder engagement plan and annual review

of the stakeholder matrix to ensure it is up to date, Croma can identify the requirements of its stakeholders at an early stage. The voluntary publication of the Sustainability Report and participation in ESG ratings increase the company's trustworthiness, create transparency and thus promote customer loyalty and long-term business relationships. In addition, a sustainability-specific survey was conducted for the first time in early 2025 with internal and external stakeholder groups and representatives.

Additional information on the procedure for performing the double materiality analysis and the occurrence of impacts, risks and opportunities in the value chain, as well as the time horizon and financial impact, can be found in the General Disclosures chapter on page 12 et seq.

G1-1 Business conduct policies and corporate culture

The five Croma values and mission statements form the basis of the corporate culture. The latter contain detailed explanations of the guiding principles and their significance in everyday work. The Croma values were developed by the leadership team based on the 9-level value model of corporate development. In the first step, the values were discussed and placed in relation to the company's fundamental beliefs and strategy. The results were then translated into company-specific values. To complement and build on this, the Code of Conduct for Employees and the Code of Conduct for Business Partners – both of which are in line with the United Nations Convention against Corruption – serve as additional guidelines for fair operating and business practices. In addition, the

sustainability strategy with its targets in the area of ethical corporate governance and compliance, the guidelines for environmentally friendly procurement, the corporate risk management system in accordance with ISO 31000 and the stakeholder engagement plan strengthen ESG performance along the entire value chain. The IT Security Regulation aims to protect the company from cyber risks, while the second-source supplier strategy promotes sustainable supply chains.

The CFO has overall responsibility for the topics human resources, supply chain, finance, sustainability & IMS and IT. The Legal department reports to the CEO. The ESG Steering Committee is responsible for evaluating the achievement of targets and progress, as well as for strategic and tactical decisions relating to corporate governance and culture. Managers serve as role models for the corporate culture and are responsible for ensuring compliance within their areas of responsibility.

Compliance with the Croma values is monitored through performance review meetings, which take the form of value-specific performance appraisals and peer feedback. Training and awareness programmes related to the Croma values and the Code of Conduct help to strengthen the corporate culture. In order to counteract any misconduct at an early stage, a mandatory Code of Conduct training programme was developed for all employees in 2024. Unlike the original reading-based training, the new format is a quiz that includes an effectiveness check. It went live in January 2025.

Any misconduct by an employee in connection with the Code of Conduct can be reported via various contact options. Violations can be reported to the management, the Human Resources department, the Legal department or the Works Council. It is also possible to send an anonymous report to the Croma Integrity Line. Depending on the severity of the misconduct, an investigation committee will be formed to investigate and document the facts. The results are then forwarded to the management for review and approval, together with a catalogue of measures.

In the event of misconduct, the person concerned will face disciplinary action. In addition, violations may also result in criminal and civil law consequences, such as recourse and claims for damages. Persons working in purchasing, sales and marketing or who are in contact with competitors in any other way must exercise particular care in this regard. If a business partner violates the guidelines and standards listed in the Code of Conduct, Croma reserves the right to terminate its business relationship with that company. Both the Code of Conduct for Employees and the Code of Conduct for Business Partners are integral parts of the contract, are anchored in the general terms and conditions and can be viewed on the Croma website. Systems from the areas of process and sustainability management as well as corporate risk management support the implementation of these values. Further instruments for ensuring sustainable corporate governance include supplier qualifications that take ESG aspects into account and corporate risk management (CRM) in accordance with ISO 31000, both of which are currently being implemented. The company-wide

introduction of CRM, which includes ESG aspects of the COSO framework, is scheduled to be completed by 2025 at the latest.

To effectively combat misconduct and protect the company from risks and damage, Croma has developed its own process for investigating incidents. A whistleblower system has been installed on its website, through which misconduct can be reported anonymously. As reports are sent directly to the Legal Director, who also handles them himself, there is no separate training for other staff members. A procedure for the independent and objective investigation of incidents is planned for the next two years. In accordance with the Whistleblower Protection Act, to which Croma is subject, whistleblowers are granted protection status. Due to resource constraints, the corresponding catalogue of measures will not be finalised until 2025. The management and monitoring of progress towards achieving targets in relation to fair business practices is carried out by the Director of the Legal Department. The evaluation of targets in the training programme is carried out by the HR Department, while the Corporate Risk Manager is responsible for company-specific risks and opportunities. Projects dealing with sustainability are handled by the Global Sustainability & IMS Director, while IT agendas are overseen by the Global Director of IT. Division-specific progress and project results are discussed at ESG Expert Group meetings and presented to the CFO and the ESG Steering Committee. Important sustainability issues are submitted to the Supervisory Board.

In order to strengthen animal welfare in science, the Code of Conduct for Business Partners contains a special section. This calls on partner companies to use animal-free methods whenever possible. In cases where animal testing is required by law, the burden on the test animals should be reduced and continuously minimised. In addition, Croma works exclusively with laboratories that comply with strict animal welfare regulations (see ESRS 2 IRO-1, p. 44).

G1-2 Management of relationships with suppliers

Croma is committed to promoting sustainable supplier management. In this context, ‘Regional value creation’ has been identified as a significant positive impact and ‘Sustainable supply chains’ as an opportunity, and corresponding targets and measures have been defined. Detailed information on this can be found under ESRS 2 SBM-3, p. 14 and Key Figures and Targets, p. 47. To prevent late payments, Croma pursues a strategy of paying invoices on time within the specified time frames. Payment terms may vary and may also require advance payments.

The company subjects GxP-critical suppliers to a qualification process before entering into a business relationship. This process includes targeted surveys, the collection of core data, QM certifications and supply chain risks, also with regard to ESG criteria. Audits prior to the start of delivery are also part of this supplier management process. If these cannot be carried out in advance due to time constraints, the supplier in question is scheduled for the next available audit. An ESG analysis carried out at the end of 2024, based on supplier qualification data, revealed that

the feedback provided was insufficient for a meaningful ESG supplier rating. For this reason, the supplier qualification process will be revised and rolled out again in the form of an IMS pilot project by the end of 2025 at the latest. Assuming that the new process is effective, suppliers and business partners will in future be subject to an ESG assessment, which will form the basis for prioritising companies with appropriate sustainability performance.

ISO certifications are reviewed by the Quality Assurance and Purchasing Departments and monitored for their expiry dates. Supplier relationships and payment terms are clearly defined and implemented in accordance with the specifications. Depending on the purchase volume, special supply contracts are concluded. In addition to the commercial contract, a quality assurance agreement is also concluded with GxP-critical suppliers, which defines quality assurance measures with regard to their responsibilities in the supply relationship. These agreements are an integral part of the commercial contract. In addition, general terms and conditions of purchase and the Code of Conduct for Business Partners form the basis for a trusting and sustainable cooperation that complies with the defined ESG minimum standards in the supply chain.

At regular intervals, the Purchasing Department prepares a risk portfolio analysis that divides core suppliers into four risk groups. Suppliers with a high risk factor and a high economic impact on Croma and the supply chain are considered separately. Where possible and economically justifiable, second and

third sources are qualified. If a second source is not economically viable, certain risk minimisation measures must be agreed with the supplier, such as safety stocks of the product to be delivered or of products from upstream suppliers. Further relationship management is carried out through regular coordination, annual reviews, audits, trade fair visits and ad hoc meetings.

G1-3 Prevention and detection of corruption or bribery

The two Code of Conduct documents deal in detail with the various aspects of corruption and bribery. They show how misconduct in this context can be prevented. Due to the economic situation and the associated resource constraints, the development of a specific prevention concept to impede and combat incidents of corruption and bribery has had to be postponed until 2025. If non-compliant behaviour by an internal or external stakeholder is brought to light, the Code of Conduct describes the exact procedure for reporting the violation. In addition, a special Code of Conduct training programme has been developed that addresses the aforementioned topics and will be mandatory for all employees, i.e. 100% of those particularly exposed to risk in the areas of purchasing, sales and marketing, from 2025 onwards. During the reporting period, around 67% of the risk group completed the company-wide Code of Conduct training. Due to a restructuring programme and changes in the ownership and Executive Board structure as well as in the members of the Supervisory Board, there was no specific training for this target group in 2024.

Reports of non-compliant behaviour can be made to the following departments: the Executive Board, the Human Resources department and the Legal department. Alternatively or in addition, an anonymous report can be made via the Croma whistleblower system. Upon receipt of a report, the Legal Director will review it for plausibility and consistency. If necessary, an internal investigation of the incident will be initiated and, if necessary, the relevant government authorities will be informed. The reporting person will be informed of the outcome of the investigation, provided this is possible in view of confidentiality and data protection requirements. The Legal Director documents all violations of this Code of Conduct and cases of fraud and reports annually to the Executive Team and the Supervisory Board of the company. Reporting a violation will never have negative consequences for the reporting person. Due to increasingly complex regulatory requirements, it was decided in consultation with the Executive Team during the reporting period to realign the role of the Compliance Officer. This process was not yet complete at the time of publication of this report.

Key figures and targets

The targets, milestones and measures relating to business conduct, as well as the current status and time frame, are shown in the table.

The targets and measures are calculated based on the number of Code of Conduct training sessions held, risk analyses conducted, operational excellence and IMS projects and sustainability projects implemented, as well as compliance and supplier audits.

Sustainability Roadmap	Time horizon	Status
Target: Practising active corporate risk management	2026	
Milestone		
Gradually introducing a corporate risk management	2025	
Measure		
Creating a corporate risk management manual	2024	
Target: Conducting a Code of Conduct training for 100% of the employees	2026	
Milestones		
Implementing a Code of Conduct training for 100% of the affiliates	2025	
Implementing a Code of Conduct training for 50% of the employees	2025	
Implementing a Code of Conduct training for 100% of the new employees	2025	
Measures		
Creating a training programme for the Code of Conduct	2024	
Including mandatory compliance with the Code of Conduct in the employment agreement	2024	
Target: Performing ESG screenings of all Croma business partners	2026	
Milestones		
Demanding commitment to the Code of Conduct from all partner companies	2025	
Demanding commitment to the Code of Conduct from all new contracting partners	2024	
Measures		
Developing a concept for ESG screening, including analysis method	2025	
Implementing a Code of Conduct for business partners	2024	
Target: Achieving positive completion of company-wide compliance audits	2026	
Milestone		
Implementing an evaluation model for compliance audits	2025	
Measure		
Developing a concept for compliance audits and creating a checklist	2025	

Sustainability Roadmap	Time horizon	Status
Target: Practising an active integrated management system	2027	
Milestone		
Gradually introducing an integrated management system	2026	
Measure		
Implementing IMS and operational excellence pilot projects	2025	
Target: Procuring materials and raw materials exclusively from sustainable companies	2030	
Milestone		
Developing a valuation model for sustainable companies	2025	
Measures		
Providing ESG information in agreements	2025	
Implementing ESG supplier audits	2025	
Implementing a sustainable procurement guideline	2025	
Implementing a Code of Conduct for Business Partners	2024	

in planning in realisation realised late

G1-4 Incidents of corruption or bribery

In the reporting year, there were 0 convictions and EUR 0 fines for violations of anti-corruption and anti-bribery regulations. There were 0 confirmed cases of corruption or bribery involving its own employees, and business partners.

G1-6 Payment practices

Invoices are generally paid on time, based on the payment terms, which may vary. No distinction is made between companies of different sizes during the payment process.

Invoices are subject to an approval process and must be authorised by the person responsible for the costs before they can be settled. With the help of the internal control system (ICS), financial data is recorded in a timely and complete manner to ensure the integrity of work processes. Expenses and sales are documented for the specified accounting period in accordance with applicable accounting standards and internal guidelines. In the 2024 period, there were 0 pending legal proceedings for late payment.

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Glossary

A

Affiliates

Affiliates are subsidiaries that are wholly owned by CROMA-PHARMA GmbH. They are organised into hubs, each of which is managed by a country or general manager. This management team is supplemented by two additional managing directors, one of whom is always appointed by the Global Commercial Director.

B

Biostimulators

Biostimulators stimulate the skin’s natural regeneration processes. The substances introduced into the skin promote the production of elastin and collagen.

Botulinum toxin

Botulinum toxin is a neurotoxin that acts specifically on nerve cells. It is used in the treatment of nerve disorders and in minimally invasive aesthetic medicine, where it is used to reduce facial wrinkles.

Bulk production

Bulk manufacturing is the production of pharmaceuticals or medical devices in large containers (in semi-solid or liquid form), which are then filled into smaller dosage forms (syringes, vials, etc.) or packaging for the end consumer.

C

Climate neutrality

Climate neutrality means that only as many GHG emissions are released into the atmosphere as can be removed again. To achieve this goal, emissions can be avoided or reduced on the one hand, and carbon emissions can be stored in sinks on the other. Croma aims to achieve its climate neutrality target for

Scope 1 and 2 without offsetting (emission credits or CO₂ certificates).

Climate scenario analysis

Climate scenario analysis is a method for assessing the potential impacts of climate change on a company or region. It uses various scenarios based on assumptions about future climate developments to identify risks and opportunities and develop adaptation strategies.

Contract manufacturer

The contract manufacturer produces on behalf of another company using materials made available to it or procures them itself. It therefore acts as a subcontractor.

Corporate Carbon Footprint (CCF)

The CCF covers all greenhouse gas emissions caused directly or indirectly by a company’s activities and is important for planning measures to reduce emissions. Emissions are expressed in CO₂ equivalents (CO₂e).

Corporate sustainability reporting Directive (CSRD)

The CSRD is an EU directive on Sustainability Reporting that requires companies to report on the impact of their own business operations on society and the environment, as well as on the risks and opportunities of sustainability issues for the company. Its aim is to make company evaluations easier to compare by using uniform standards.

D

Decarbonisation

Decarbonisation refers to the reduction of carbon emissions caused by activities such as transport, industrial processes or energy production. The aim is to replace fossil fuels with carbon-free energy sources and thus significantly reduce GHG emissions.

Discard rate

The discard rate (also known as reject rate) indicates how many defective products are produced in relation

to the total production and cannot be reworked or reprocessed. It is expressed as a percentage of the total production volume. The corresponding value illustrates how many resources are wasted.

E

Earnings Before Interest, Taxes, Depreciation and Amortisation (EBITDA)

EBITDA is a business indicator that reflects a company’s operating profit before investment expenditure. Factors such as taxes, interest or depreciation on tangible assets and intangible assets have no effect on EBITDA.

EcoVadis

EcoVadis is a leading global provider of sustainability ratings for companies. The platform helps companies to manage their ESG (Environmental, Social, Governance) risks, achieve sustainability goals and improve the performance of their value chain.

Environmental, Social and Governance (ESG)

The term refers to the sustainability-specific dimensions of companies and has become established primarily in relation to sustainable investments. ESG is used to measure a company’s impact on society and the environment.

ESG Transparency Award

The ESG Transparency Award is an award given to companies for their transparent reporting and implementation of sustainability goals and measures, thereby contributing to improving environmental and social responsibility.

European Sustainability Standards (ESRS)

The ESRS are reporting standards to fulfil the requirements of the CSRD. They represent the framework on the basis of which companies must publish their information.

F

Filler

Fillers are substances with a filling character that are injected under the skin. The aim is to lift sagging skin areas or plump up wrinkles. They are used on the face, décolleté area and hands.

Food and Drug Administration (FDA)

The FDA is a federal agency of the United States that is part of the Department of Health and Human Services. Its main job is to protect and promote public health by regulating the safety and effectiveness of pharmaceuticals, biological products, medical devices, food, cosmetics, and other products.

G

Greenhouse gases (GHG)

Greenhouse gases are trace gases such as carbon dioxide (CO₂), methane and nitrous oxide, which cause a greenhouse effect in the atmosphere. Greenhouse gases can be of natural origin, but can also be caused by humans.

Greenhouse Gas Protocol (GHG Protocol)

The GHG Protocol is the result of cooperation between private organisations and companies. It provides a method for measuring GHG emissions from organisations or even countries. Emissions are considered throughout the entire product cycle.

H

Hyaluronic acid

Hyaluronic acid is a component of connective tissue and joint fluid and ensures firm skin, for example, by binding large amounts of water. It can act as a lubricant for painful joints and supplies organs and skin with moisture. It is also used in ophthalmology (eye medicine).

I

Integrated Management System (IMS)

The IMS combines methods and tools for complying with requirements from various areas (e.g. quality, environmental and risk management, process and lean management, ISO 14001 audits, etc.) into a uniform structure that serves corporate governance (i.e. the management and monitoring of organisations). Intergovernmental Panel on Climate Change (IPCC) The IPCC is an intergovernmental body of the United Nations whose main task is to provide governments at all levels with scientific information that they can use to develop climate policies.

ISO 14001:2015

ISO 14001 is an international, certifiable environmental management standard. The aim is to support companies in promoting environmental protection by preventing or at least reducing negative environmental impacts.

ISO 31000:2018

ISO 31000 is an international, non-certifiable risk management standard. It specifies normative guidelines that describe the risk and opportunity management of companies. The standard can be applied to all types of risks.

L

Labelling

Labelling refers to the process of marking products or information with labels that contain important details

about the product or information. It is an essential part of communication between manufacturers, consumers and regulatory authorities and plays an important role in ensuring transparency, safety and quality.

M

Medical Device Regulation (MDR)

The MDR is an EU regulation that governs the legal requirements for the placing medical devices on the market, making them available on the market and putting them into service in the European Union. It replaces the former Medical Device Directive (MDD).

P

PESTEL

The PESTEL analysis is a strategic planning tool for evaluating external macroeconomic factors that can influence business activities. The name stands for the six main categories political, economic, social, technological, environmental and legal.

R

respACT

respACT is an Austrian corporate platform for sustainable business. It promotes sustainable business models, initiates collaborations and is committed to the ten principles of the UN Global Compact and the UN Sustainable Development Goals.

S

Science Based Targets (SBTs)

SBTs are science-based, measurable and achievable reduction targets for companies. The focus is on the amount of emissions that must be reduced in order to

achieve the goals of the Paris Climate Agreement (limiting global warming to 1.5°C).

Scope 1, 2 and 3 emissions

The equivalence factors according to the IPCC are used to calculate greenhouse gas emissions. Scope 1 emissions are direct GHG emissions generated on site by fuels (e.g. diesel, petrol, natural gas, refrigerants). The actual consumption of natural gas, diesel and refrigerants and the emission factors of the Austrian Federal Environment Agency were used for the calculation. Scope 1 emissions were recorded in full. Scope 2 emissions are indirect GHG emissions that arise as direct emissions at the energy supplier. The calculation was based on electricity and district heating consumption and, with regard to market-based emissions, on the supplier mix according to certificates of origin. When accounting using the location-based emission factor, GHG emissions were calculated based on the Austrian electricity mix. Scope 2 emissions were recorded in full. Scope 3 emissions are further indirect greenhouse gas emissions that occur in the upstream value chain. The categories were selected using a Scope 3 screening based on defined criteria. This identifies the main emission categories. The criteria and projections were used to rank the main emission categories. Scope 3 emissions were recorded on the basis of the main categories, i.e. partially. Emissions factors from various databases and sources were used to calculate the respective categories. Scope 3-1 Purchased goods and services: Agribalyse, All you can eat for climate, DEFRA, German Federal Environment Agency, Ecoinvent, Exiobase, Kreditanstalt für Wiederaufbau, OECD Data Explorer. Scope 3-2 Capital goods: Exiobase. Scope 3-3 Fuels and energy: EVN Giga Float Natur und Fernwärme, Kelag Versorgermix, Austrian Federal Environment Agency. Scope 3-4 Upstream transport and distribution: Ecoinvent. Scope 3-5 Waste generated in operations: DEFRA, Ecoinvent. Scope 3-6 Business travel: Exiobase, Austrian Federal Environment Agency. Scope 3-7 Employee commuting: ADEME, DEFRA, German Federal Environ-

ment Agency, Ecoinvent. Scope 3-8 Upstream leased assets: Austrian Federal Environment Agency. Scope 3-9 Downstream transportation: Cargo Partner, Ecoinvent, Exiobase, trans-o-flex, UPS. Scope 3-12 End-of-life treatment of sold products: Ecoinvent. **Sustainable Development Goals (SDGs)** The SDGs are the 17 goals set by the United Nations. They form the core of the 2030 Agenda and promote environmentally, socially and economically sustainable development. The SDGs are to be achieved globally and by all UN member states by 2030.

U

UN Global Compact

The UN Global Compact is an initiative of the United Nations that calls on companies to align their strategies and business practices with ten universal principles of sustainability and social responsibility, thereby promoting responsible and sustainable business practices.

V

Virgin Plastic

Virgin plastic is plastic made from fossil materials that is completely newly manufactured and does not contain any recycled material.

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Disclaimer

This sustainability report also contains forward-looking statements that are based on current assumptions and estimates that are made by CROMA-PHARMA GmbH to the best of its knowledge. Statements using words such as ‘should’, ‘will’, ‘expected’, ‘intended’ or similar formulations indicate such forward-looking statements. The forecasts that refer to the future development of the company represent estimates that were made on the basis of the information available at the time of publication of the sustainability report. If the assumptions on which the forecasts are based do not materialise or risks occur to an extent not calculated then the actual results may deviate from the forecasts.

Rounding differences may occur with regard to the totalling of rounded amounts and percentages. The Sustainability Report was prepared with the utmost care to ensure the accuracy and completeness of the information in all sections. However, rounding, typesetting, and printing errors cannot be completely ruled out.

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