

Sustainability 2023

Statement of the CEO

149 Statement of the CEO

Introduction

150 Purpose and business model

154 Material topics

Sustainability at Comet

157 Strategy: the Comet way

158 Governance and organization

Climate action roadmap

160 Climate reporting

166 Targets and priorities

Report in Accordance with GRI Standards

168 Environmental

174 Social

184 Governance

186 Economic

GRI Content Index

190 GRI Content Index

Basis of calculations and definitions

196 Basis of calculations and definitions

Independent Assurance Report

200 Independent Assurance Report on selected KPIs in the Sustainability Report 2023

Statement of the CEO



"Sustainability is key to our future success."

Stephan Haferl
Chief Executive Officer

Comet is committed to a strategy based on responsible and sustainable action. This is an important part of our value proposition to customers, investors and employees as we constantly strive to build an even more high-performing organization. In fact, for many years, we have already been following practices such as using green electricity, conserving resources, helping people in need, supporting educational projects and respecting equality and diversity. But we would like to do even more to fully live up to our responsibility as a corporate citizen. In this spirit, we are tackling these topics in a structured and global way in order to systematically improve our performance on the path to a future worth living for generations to come.

In 2023, we faced considerable challenges due to the powerful correction in the semiconductor cycle. Despite the demanding market environment, we made significant progress by focusing on the implementation of our strategy, while at the same time pushing ahead with our sustainability program. For us, sustainability is about much more than paying lip service – it is an ethos that we want to ingrain deeply in our culture. Determined to stand behind our promise, we have further developed our climate strategy, strengthened our social engagement and accorded the elements of good corporate governance the importance they deserve.

We firmly believe that our technologies can contribute to a better, fairer and more sustainable world. To this end, we will continue to focus on developing solutions that add value for our customers while protecting the environment and honoring the needs of society. We are proud that sustainability is well on track to become an integral part of our corporate culture.

Introduction

Purpose and business model

How we generate value and contribute to a world that is good to live in

As a trailblazing, leading tech company in radio frequency power and x-ray technology, we make a growing contribution to a safer, more efficient and sustainable world of manufacturing, communication and mobility.

Our high-tech products and services create value for countless people. Part of this value comes from our setting goals that go beyond shareholder returns. In everything we do, we aim to balance economic, environmental and social aspects in order to thus support a sustainable future and profitable long-term growth.

As a close and trusted partner to our customers, we expect to:

- Develop innovative and sustainable products that support our customers in realizing their strategies
- Leave the smallest possible environmental footprint along the entire value chain
- Provide career opportunities for employees in all our businesses and at all our sites
- Build relationships with suppliers and business partners based on fairness and transparency
- Take a leading role in sustainable development in our industry

Our ESG program serves as a compass for managing our environmental footprint, taking responsibility for our employees and satisfying the highest standards of compliance and governance. Our focus is on the long term.

Our business model

We strongly believe that in a world of finite resources, innovation improves all our lives.

The resources we draw on



Environmental

- Implement roadmap for efficiency gains and renewable energy use
- Enforce sustainability through supplier selection



Social

- Build customer relationships and co-creation capabilities
- Invest in people, culture and values
- Engage in communities



Governance

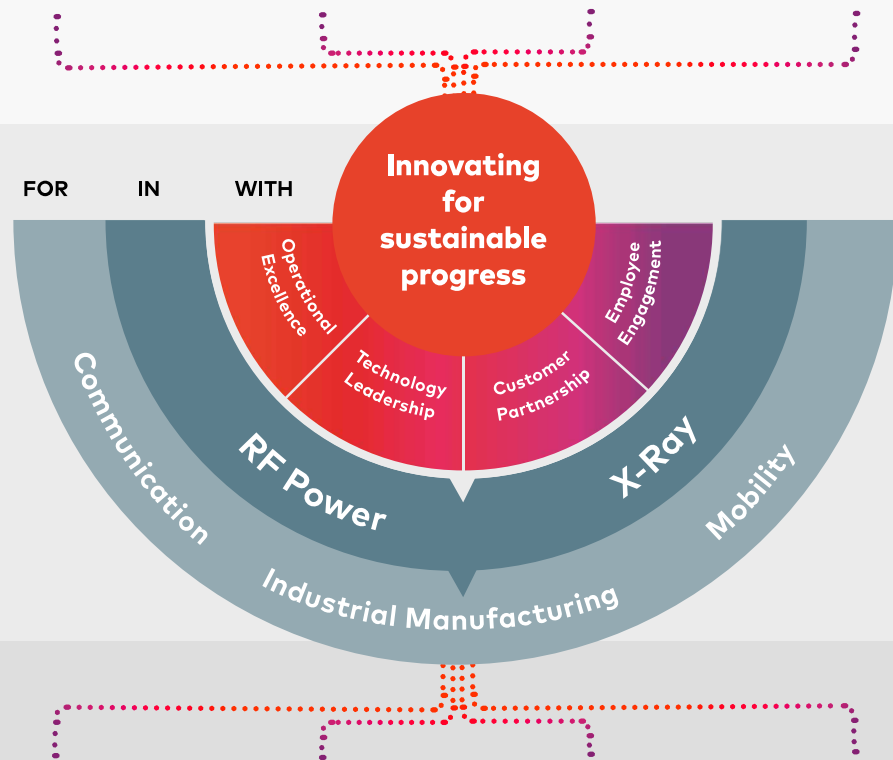
- Monitor and train adherence to Code of Conduct and ethical principles
- Embed regulatory standards in day-to-day operations



Economic

- Maintain access to capital
- Achieve high brand recognition
- Make targeted investments

How we create value



The outcome we achieve

- Optimized efficiency and reduced greenhouse gas emissions
- Resilient and sustainable supply chain
- Increased customer loyalty and satisfaction
- Engaged, skilled and diversified workforce
- Strengthened license to operate
- High standards of behavior
- Full compliance with regulatory standards
- Sustainable financing of growth strategy
- Higher share of sales from semiconductor market
- Higher returns
- Capability to meet future customer needs

The impact of our actions



We provide stable and fair work for staff at all Comet locations worldwide.



Through innovation we contribute to a sustainable infrastructure.



We satisfy customer standards through binding supplier standards.



We contribute to emission reduction and the efficient use of energy.

Along our value chain, we rely on numerous resources in order to manufacture our products and provide our services. This is always done with the aim of using these resources as efficiently as possible and of minimizing the risks associated with their procurement.

Environmental: As a manufacturing company, we depend on a reliable supply of energy and raw materials. Wherever possible, we procure electricity from renewable sources such as hydropower, solar or wind energy. When purchasing raw materials, we work with suppliers who can provide us with information about the origin of their products and who are interested in long-term business relationships. At our own production sites around the world, we are always working to keep our processes and facilities up to date in order to continuously improve production efficiency and thus reduce material and energy consumption. While we see only low environmental risks in our internal processes, we are exposed to developments in global energy and raw material markets and to disruptions in our supply chains.

Social: As a corporate citizen, we are aware of our responsibility in a world with ever more people and limited resources. Qualified and highly

committed employees are central to our past and future success. We invest in a corporate culture that – in everything we do – is based on customer orientation, on empowering people and on trustful collaboration.

Governance: The individual behavior of each one of us – how we interact with colleagues, customers, suppliers, and all other stakeholders – determines our success as a company. The values and principles of our Code of Conduct form the foundation of our corporate culture and the basis for all our actions and decisions. We strive for best-in-class governance in order to safeguard our excellent reputation. This mitigates the risk of losing customers, suppliers or employees.

Economic: We invest a high proportion of our profit in targeted long-term and sustainable growth. Access to sufficient equity and debt capital is ensured by our company's balanced and conservative financial policy. Operating from this position of financial strength, we have consistently delivered value for our stakeholders over the past decades. Our success story is reflected in high awareness of the Comet brand among customers and competitors.

As a pioneering and leading tech company in radio frequency power and x-ray technology, we make a growing contribution to a safer, more efficient, and sustainable world of industrial production, communications, and mobility. We are the high-tech company of choice for all those who are actively shaping the future and an employer for all who want to get involved, make a difference, and explore new territory. We are committed to continuously developing our four

core competencies of operational excellence, technology leadership, customer relationships and employee engagement. With our forward-looking technologies, we are a preferred partner to the most innovative companies in our markets. We stand for solutions and services deliver high value-added and sustainable progress. In pursuing our aims, we are guided by our long experience and keen spirit of discovery and innovation.

Led by experience. Driven by curiosity.

Environmental: The thoughtful use of energy and resources, the expansion of renewable energy use, and a constant increase in efficiency throughout the entire value chain – with a focus on suppliers and production – together lead to a reduction in the emissions we cause. The data systematically collected in relation to this formed the basis for our climate roadmap.

Social: Through our activities in the social realm, we create value for our employees, our customers and our communities worldwide. Our employees benefit from progressive working conditions, a high standard of occupational health and safety, and a culture based on trust. This creates the foundation for superior performance and thus a high level of customer satisfaction and loyalty that in many cases endures over years. Finally and importantly, we fulfill our social responsibility by supporting community projects and privately funded initiatives.

Governance: Strict adherence to and full compliance with laws, policies and regulatory standards at the local, national and international level is an important asset on which our reputation is based. The ethical conduct of all individuals and partner organizations with whom we work also contributes to this. All internal and external stakeholders can rely on us to treat them fairly and ethically at all times.

Economic: Thanks to our strong positioning, solid financial footing, secure access to capital and the successful implementation of our focus strategy, we are growing our business. Anticipating customer needs and investing in advance are key in helping customers succeed with our leading-edge technologies. Backed by the Group's sustainable financing, we will continue to fulfill these activities in the long term and thus add value for all stakeholders.

The Comet Group contributes to the achievement of the Sustainable Development Goals developed by the United Nations as part of the 2030 Agenda. With our long-term and sustainable focus strategy, we aim to provide measurable added value as well as a clearly identifiable contribution to the improvement of the environment, society and the economy. Our focus is on those objectives over which we have the greatest influence in our business:

Decent work and economic growth: Our technologies are at the heart of digitalization. As a company with a long teaching tradition, we support dozens of apprentices, trainees and young professionals and help pave their road to success. By doing this, we actively contribute to economic growth, as these young talents become crucial for developing our innovative products that play a vital role in the digitalization of society.

Industry, innovation and infrastructure: As a critical supplier and partner to the semiconductor/electronics industry as well as to the automotive, aerospace

and security market, we are co-creating with our customers to develop the innovative solutions that provide sustainable progress and improve safety, security and quality of life for people everywhere.

Responsible consumption and production: We reject the ruthless pursuit of profit at the expense of the environment and society. We strive for a balance between economic, environmental, and social goals by training and sensitizing our employees worldwide regarding ecological and social aspects, by and also involving customers, suppliers and other interest groups.

Climate action: We are committed to actively addressing climate change and contributing to the climate goals of the 2030 Agenda for Sustainable Development. To this end, we have developed and are implementing a climate action roadmap.

Following the sale of the ebeam business in 2020, the Comet Group is concentrating on its traditional technology areas of plasma control and x-ray, as well as on expanding its service business, which is based on the growing use of artificial intelligence and machine learning in all areas of life. By focusing on these two technologies, we want to exploit the considerable potential of the digital world.

Comet is focused on four core markets with strong long-term growth. First and foremost, the semiconductor and electronics market offers enormous potential for all three divisions. In addition, the traditional automotive, aerospace and security industries offer attractive opportunities for us, particularly in innovative segments such as battery testing for electric vehicles. Comet's diversified market focus puts it in an ideal position to benefit from current and future trends in these key industries.

The semiconductor and electronics market is and will remain the central market for Comet - despite its cyclical nature. Forecasts predict high single-digit growth for the semiconductor market until 2030. Demand for sensors and microchips is also rising steadily in traditional industries. We therefore expect to generate over 80% of our sales with high-tech X-ray and plasma control solutions for the semiconductor & electronics market in the coming years.

As a globally active company with Swiss roots, Comet generates more than 99% of its sales in the key regions of Asia, North America and Europe. As an important supplier to the dynamic semiconductor industry, we ensure proximity to our customers with a sensible choice of location. The choice of location also has a significant influence on the selection of our suppliers and the design of efficient supply chains. In view of the trend towards regionalization in semiconductor manufacturing, we must be able to adapt our production network quickly and flexibly.

The semiconductor industry and its suppliers, including Comet, are facing various challenges in connection with climate change. The production of semiconductors consumes significant amounts of electricity, water and process gases, which results in a significant CO₂ footprint. In the automotive, aerospace and security industries, there is also a need to reduce climate-damaging emissions.

In the semiconductor industry, Comet's core market, producers rely on innovative manufacturing processes and the use of gases with a lower global warming potential in order to reduce their CO₂ footprint. Semiconductor manufacturers are pursuing ambitious environmental strategies, such as the use of 100% renewable energy in the short term, or the goal of reducing emissions to net zero by 2050.

To achieve their climate targets, semiconductor manufacturers are involving their suppliers in efforts to reduce their greenhouse gas footprint. We want to support them in achieving their targets in this regard. But that's not all: driven by the incentive to make a contribution to reducing greenhouse gas emissions, Comet has launched a comprehensive ESG program, which is being implemented step by step.

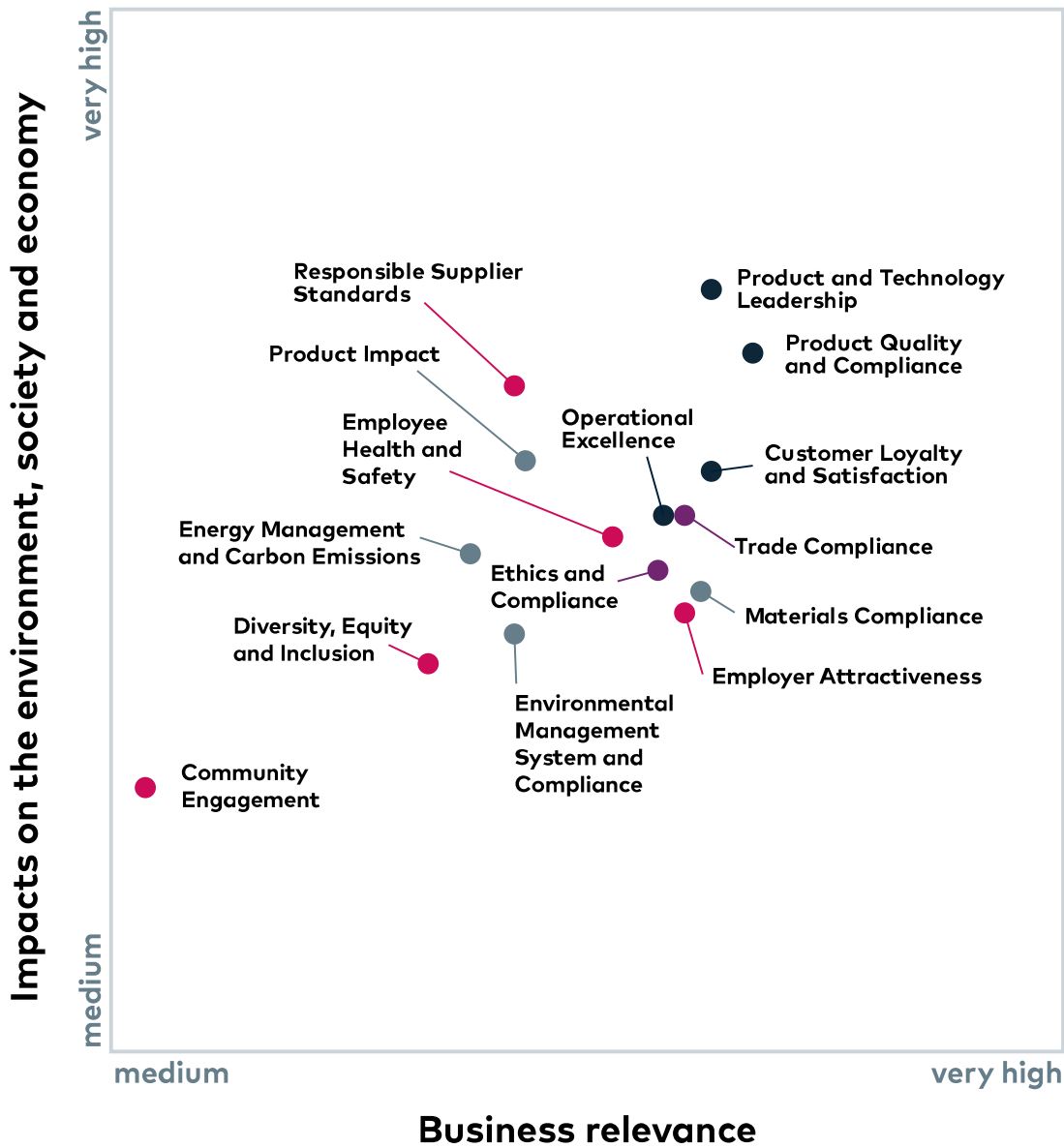
Material topics

Comet made significant progress in implementing its sustainability strategy in 2023. Notably, greenhouse gas emissions were estimated in the value chain (Scope 3 according to the Greenhouse Gas Protocol) for the first time, an eco-design project was launched, and an action plan was developed to switch the Comet Group to 100% electricity from renewable sources by 2030. In another first, Comet developed a report on non-financial matters under Swiss law. This is largely based on the Report in Accordance with GRI Standards. The content of the Report in Accordance with GRI Standards, which applies the concept of double materiality, addresses those topics that have the greatest medium- and long-term impact on the environment, society and economy and the greatest relevance for business success.

To ensure that the key topics are up to date, Comet regularly reviews which topics are central to the long-term, sustainable development of the company. The aim of updating the materiality analysis in the reporting year to incorporate dual materiality was to review the relevance of the topics already identified in previous years and verify the strategic parameters for the prioritization of topics. The selection of topics itself is based on the central elements of the corporate strategy and of long-term planning on the one hand, and on inputs from management and stakeholders on the other.

As part of a context analysis, the existing material topics developed in 2021 were first examined as to whether they remained relevant in light of the present business model, and were found to remain appropriate. The topics from the economic, environmental, social and governance categories were then analyzed according to the principle of double materiality: Relevant stakeholder groups assessed the impact of these topics on the economy, the environment and society in a survey. Feedback from a total of 67 stakeholders was incorporated, including investors and analysts (with a weighting of 25%), suppliers and business partners (weighting of 25%), customers (weighting of 25%) and Comet employees (weighting of 25%). In a second survey, a total of 32 managers from Comet's various divisions and from Group headquarters assessed the materiality of the topics for the company's long-term business success. The resulting materiality matrix was validated and approved by the Executive Committee and the Board of Directors of Comet Holding AG.

The result of the materiality analysis is presented in the materiality matrix. The 15 material topics form the basis for this sustainability reporting.



- Economic (Business) Topics
- Environmental Topics
- Social Topics incl. Employee Topics
- Governance/Ethics Topics

We work closely with Comet's stakeholders to improve performance on our material topics. Our most important stakeholders are our employees, customers, suppliers and shareholders. Some of these stakeholders have a direct influence on the improvement of the material topics, while others are affected by the resulting measures. We are therefore in regular contact with these stakeholders, in some cases even on a daily basis. Typical interactions include quarterly conference calls between the CEO and CFO and employees, interactions via the Viva Engage social networking platform, regular meetings and phone calls with customers and suppliers, investor conferences, capital market days with financial analysts and shareholders, and the annual meeting of shareholders. In 2023, the dialog with our stakeholders led to various measures taken in all four dimensions – economic, environmental, so-

cial and governance. Examples include the introduction of a new x-ray system tailored to customers in the semiconductor industry, the inclusion of environmental criteria in the planning of a new building in Penang, Malaysia, and Comet's full coverage of the loss of income caused by short-time working in Flamatt.

Sustainability at Comet

Strategy: the Comet way

For 75 years, we have been developing and producing innovative high-tech components and systems based on x-ray and radio frequency technology. Consistent alignment with global trends and developments was and is the basis of our success.

For Comet, sustainability is one of the central pillars of the high-performing organization we strive for, alongside technological leadership. Consistent with this, our company has long been actively committed to the concerns of the socially disadvantaged, to supporting and delivering the training of young people, to promoting diversity, and generally to reducing energy consumption and using sustainable energy sources. In order to further intensify these efforts and coordinate them even better within the Group, we want to work in these areas in a structured manner at a global level. As a company that is aware of its social responsibility and knows how to live up to it, we set ourselves long-term goals that we implement in small steps in the short term in order to improve every day.

Adding value beyond shareholder return



The main objective of our sustainability program is to create value-added that goes beyond the financial return for our shareholders, and do so based on quantifiable criteria. To emphasize the seriousness of this commitment, in 2023 we integrated non-financial key performance indicators (KPIs) into the Executive Committee's long-term incentive plan (LTIP). This underlines our clear commitment to sustainability, with the aim of continuously improving our environmental, social, governance and economic performance. Our approach combines long-term thinking with an incremental approach, consistently implementing one step at a time.

Sustainability encompasses a broad array of aspects, including climate action, compliance with legal and contractual obligations, and acting responsibly in our dealings with people. In response to these diverse re-

quirements, Comet has taken specific measures since first implementing its formal sustainability program, which cover the following areas:

Gradual improvement of our sustainability performance

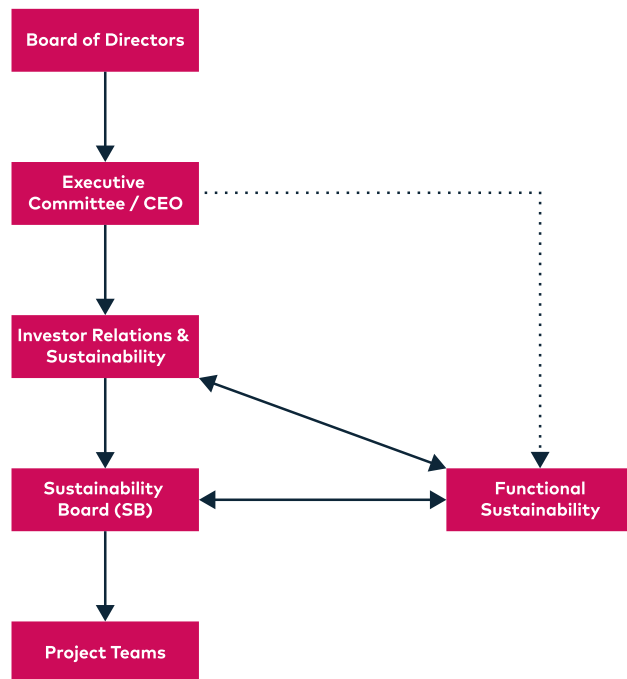
- Evaluation and definition of material topics
- Analysis of the status of the material topics
- Development of an overarching sustainability strategy with a focus on climate protection
- Creation of appropriate sustainability governance structures
- Annual definition of focus areas and step-by-step implementation

We take a systematic, yet pragmatic approach to sustainability. Aligning the sustainability strategy with the business strategy is one aspect. Sustainability is a priority for the Board of Directors and the Executive Committee. Just as important for success, however, is the integration of sustainability consciousness into the corporate culture in order to involve and engage every employee. Sustainability goals can only be achieved if they are lived by the people in the company and are thus in line with Comet's values and convictions. To accomplish this, we must raise awareness among all employees that sustainability is pursued not only to serve the company, but also as a guarantor for a future worth living for us all. We therefore encourage our employees wherever possible to participate in generating ideas and implementing them in a bottom-up approach. At the Flamatt site alone, the call to our employees to contribute ideas for improving our environmental footprint resulted in about 100 suggestions with impacts ranging from relatively small to large. Some of the ideas have already been implemented, others will follow. One thing is clear: We are not driven by regulations and rankings as much as by the firm conviction that Comet's long-term success is closely linked to sustainable business practices.

Governance and organization

Sustainability must be part of strategic management and corporate planning. This is because the company can take a holistic view only when sustainability is integrated in the ways the company is managed. Through forward-looking governance practices, Comet can positively influence environmental, social and economic development. Accordingly, we strive to integrate sustainability into each of our many business processes. To do so, the measurement and management of sustainability performance must be integrated into corporate strategy and governance. Taking sustainability into account throughout the corpo-

rate management process is therefore a prerequisite for effective sustainability management.



The Board of Directors is responsible for overseeing and approving the sustainability strategy. It is also responsible for the review and approval of the annual sustainability reporting as part of the reporting process. The Board receives quarterly updates on the progress made in implementing the strategy and thus monitors the achievement of the sustainability targets. Specific subject areas are dealt with by the relevant committees of the Board of Directors. For example, the Audit Committee covers reporting, the Technology Committee deals with eco-design, and the Nomination & Compensation Committee handles the non-financial aspects of executive compensation. The practical implementation of the sustainability strategy is delegated by the Board of Directors to the Executive Committee.

The Executive Committee is responsible for executing the sustainability strategy and preparing the annual sustainability report. The Chief Executive Officer (CEO) assumes the role of sponsor for the sustainability program. The Executive Committee is supported in the implementation of the strategy by the Vice President of Investor Relations & Sustainability (VP of IR & Sustainability).

The VP of IR & Sustainability is responsible for planning, organizing and monitoring the operational implementation of the sustainability program. He or she coordinates the cross-functional and cross-project activities and, as chair of the Sustainability Board, leads the preparation of this body's decisions. The VP of IR & Sustainability reports to the Executive Committee on a quarterly basis on the progress made in executing the strategy.

The Sustainability Board, consisting of representatives from the upper management levels of the company, also meets quarterly. It discusses ongoing sustainability initiatives, initiates new projects and prepares sustainability targets for approval by the Executive Committee. The Board ensures the coherence of the sustainability initiatives within the Comet Group.

The detailed elaboration and operational implementation of the sustainability initiatives is carried out in various project teams that cover the material topics. These are made up of representatives from the divisions and Central Services (Group functions) who are responsible for the respective topic in their area of activity.

Climate action roadmap

The semiconductor industry and its suppliers, including Comet, are facing various challenges in connection with climate change. Semiconductor fabrication consumes significant amounts of electricity, water and process gases, resulting in a considerable carbon footprint. Furthermore, demand for microchips is forecast to increase by about 9% annually from 2023 to 2030, which will further increase the environmental footprint of production. In important markets such as the automotive, aerospace and security industries, there is also a need to reduce climate-harming emissions.

In the semiconductor industry, Comet's key market, manufacturers are focusing on innovative production processes and the use of gases with a lower greenhouse potential in order to reduce the carbon footprint. Semiconductor manufacturers are pursuing ambitious environmental strategies, such as the use of 100% renewable electricity in the short term or the goal of reducing emissions to net zero by 2050.

To achieve their climate targets, semiconductor manufacturers are involving their suppliers in efforts to reduce their greenhouse gas footprint. For Comet, this results in the need, in addition to the will, to make a contribution to lowering greenhouse gas emissions.

Climate reporting

In the sustainability report for 2023, Comet is publishing information on climate-related risks and opportunities for the first time, in accordance with the requirements of the Task Force on Climate-related Financial Disclosures (TCFD). The reporting covers the identified physical and transition risks and opportunities that could affect Comet's business model. The governance structure, strategy, risk management process and relevant key performance indicators are also stated. These elements serve to overcome challenges related to climate change, miti-

gate potential negative financial impacts and leverage potential benefits.

Governance

The Board of Directors oversees and approves the sustainability strategy, including its climate-related aspects. It is also responsible for overseeing and directing the development of a climate action plan. Climate issues, like Comet's other material topics, are discussed by the Board of Directors on a quarterly basis as part of the business transformation agenda. In addition, climate risks will be integrated into the deliberation on business risks from 2024. Their discussion and review are on the agenda of the Board of Directors at least twice a year. A detailed description can be found in the "Governance and organization" section of this report.

Strategy

In 2021, Comet launched a formal, Group-wide sustainability initiative that also includes climate-related aspects. Part of this initiative is a climate action roadmap to guide Comet in analyzing and reporting its greenhouse gas emissions in detail. The aim is also to review scenarios for reducing these emissions and to set ambitious targets in line with the Science-Based Targets Initiative (SBTi). Specific action measures have been adopted to achieve these goals, including the development of a climate action roadmap and the initiation of a group-wide eco-design project.



In 2024, Comet will further develop the climate action roadmap in a top-down process. We already implemented various initiatives in 2023 using a bottom-up approach. This included reporting on Scope 1 and Scope 2 emissions, setting initial targets for Scope 2 emissions, obtaining a first estimate of Scope 3 emissions, and various measures to reduce the carbon footprint. The intended step of committing to the goals of the Science-Based Targets initiative has been postponed until the end of 2024 in order to gain a deeper understanding of the potential to reduce emissions in the value chain before the targets are submitted.

Comet is conscious of the urgency of climate action. However, we also recognize that the commitment to medium-term, science-based targets (SBTs) and the achievement of net zero emissions in the long term can only be realized by continually overcoming numerous challenges. These include reducing CO₂ emissions when purchasing materials and when customers use our products. Achieving progress in this area requires close collaboration with customers, partners and suppliers.

Focus on analysis and initial implementation measures

To tackle the challenges of climate change and reduce our CO₂ emissions, the following measures will be the most important components of our action plan.

Six main drivers to reduce our carbon footprint:

Six main drivers to reduce our carbon footprint

- Switch facilities to the use of electricity from renewable resources
- Identify and execute energy efficiency measures in our operations and value chain
- Incorporate eco-design thinking in product development
- Set measurable targets, monitor achievements, and report on our progress
- Develop processes and frameworks to enhance data quality and accurately measure progress
- Encourage suppliers to participate in this effort and drive sustainability in their operations

In our operations we have carried out various initiatives in recent years. For example, our own plant in Flamatt, Switzerland, is operated on 100% renewable electricity. At our leased sites, in Hamburg, Germany, and San Jose, California, we also purchase completely renewable electricity from the landlords.

With regard to Scope 3 emissions, we reviewed the initial findings from the previous year and, on this basis, expanded the categories with the greatest impact on Comet's greenhouse gas (GHG) emissions. This process led to the conclusion that seven of the 15 Scope 3 emission categories are responsible for the majority of GHG emissions:

- Category 1 – Purchased goods and services
- Category 2 – Capital goods
- Category 4 – Upstream transportation and distribution
- Category 6 – Business travel
- Category 7 – Employee commuting
- Category 9 – Downstream transportation and distribution
- Category 11 – Use of sold products

Based on a previous analysis, Comet has carried out an initial Scope 3 screening. For what we consider to be the most important categories, we estimated the approximate greenhouse gas emissions using a spend-based economic input-output method. This screening revealed that the Scope 3 emissions of approximately 61,000 tons of CO₂ equivalent account for about 90% of the total emissions directly or indirectly caused by Comet. Further work to calculate Scope 3 emissions more precisely is planned for 2024 in order to achieve higher transparency and data quality. Based on this refined database, Comet intends to develop initiatives to reduce Scope 3 emissions.

Climate-related physical risks and transition risks

Comet differentiates between physical and transition climate risks, in accordance with the guidelines of the Task Force on Climate-related Financial Disclosures. Physical risks result from direct climate events and have a direct impact on Comet's business activities. Transition risks, on the other hand, arise from the gradual decarbonization of the

economy or from changes in the legal, social, economic and technological environment. The most significant risks for Comet include:

Risk	Characterization	Description
Disruption of the supply chain due to natural disasters	<ul style="list-style-type: none"> • Acute physical risk • Upstream value chain • Short-term time horizon • Very likely to occur • Low to medium impact expected 	As part of the manufacturing industry, Comet is dependent on a supply of raw materials and intermediate goods for its products. Climate change is expected to lead to an increased likelihood of storms and natural disasters, which could cause temporary disruptions to supply chains.
Impact of storms and other extreme weather events on Comet sites	<ul style="list-style-type: none"> • Acute physical risk • Upstream value chain • Short-term time horizon • Very likely to occur • Low to medium impact expected 	Some of the company's sites are located in the Northwest Pacific region, a hot spot for tropical storms. Climate change could lead to an increase in typhoons and other extreme weather events, which would expose these locations to increased risk of damage.
Rising costs for raw materials and intermediate goods	<ul style="list-style-type: none"> • Transition risk • Upstream value chain • Short to medium-term time horizon • Very likely to occur • Medium impact expected 	Comet uses highly specific materials to manufacture its products. Due to changing ESG or climate-related regulations, including additional CO2 taxes impacting global supply chains, the cost of raw materials could increase, which would pose a financial risk. In addition, the availability of certain raw materials could be limited due to geopolitical circumstances.
Regulation of existing products and services	<ul style="list-style-type: none"> • Transition risk • Downstream value chain • Medium-term time horizon • Likely to occur • Medium impact expected 	Stricter regulations could pose a risk to the sale of Comet's existing products and services. For example, the European Ecodesign Directive sets environmental performance requirements for the design of energy-using products.
Customer demands for a reduction in CO2 emissions from products and the transition to energy from renewable sources	<ul style="list-style-type: none"> • Transition risk • Downstream value chain • Short to medium-term time horizon • Very likely to occur • Low impact expected 	The semiconductor industry, which accounts for over 70% of Comet's net sales, is resource-intensive and generates significant CO2 emissions. Comet's customers are therefore striving to reduce CO2 emissions in their upstream value chain. Should Comet not participate in these efforts, it could lead to a loss of business opportunities.
Reputation risk: Public demand for continuous review of climate risks and publication of the results of the analyses	<ul style="list-style-type: none"> • Transition risk • Medium to long-term time horizon • Unlikely to occur • Low impact expected 	Reputational risk becomes relevant if interest groups, including investors, react inappropriately to the company's response to climate risk or to its disclosure of information. Such reactions can have a financial impact; for instance, by making it more difficult to raise capital or leading to the loss of business opportunities.

Strategic elements for enhancing climate-related risks for Comet's business

Comet expects that the downstream transition risks resulting from the shift to a low-carbon economy will have an impact on Comet's business, particularly with regard to the entire semiconductor industry. However, these developments have medium-to long-term relevance,

which is why they are not currently a high priority for Comet. Nonetheless, Comet plans to carry out a more detailed analysis of climate-related scenarios in order to gain a deeper understanding of the climate-related risks.

In 2023, Comet launched an ecodesign initiative, which includes an action plan, training and life cycle assessments to better understand the CO₂ footprint of the products. The aim is to continuously optimize the product portfolio while taking sustainability aspects into account, including investment in research and development.

Climate-related opportunities

In addition to the risks, Comet has also identified two climate-related opportunities that could potentially have a significant financial or strategic impact on the company.

Opportunity	Characterization	Description
Increased demand for products and services	<ul style="list-style-type: none"> • Downstream value chain • Medium to long-term • time horizon • Medium to high impact expected 	X-ray systems are attracting growing interest in the manufacturing processes of the semiconductor advanced packaging sector as well as in the other major industries that Comet serves. These include the automotive, aerospace and security markets. In all these sectors, x-ray systems lead to an improvement in production processes. Moreover, with 100% x-ray inspection, the quality of the manufactured parts themselves can also be improved to such an extent that standard safety factors in the design calculations can be reduced. This reduces material and energy consumption. The growing recognition of the climate issue should therefore lead to higher demand for Comet's products in the medium term.
Resilience in energy procurement	<ul style="list-style-type: none"> • Upstream value chain • Medium-term time • horizon • Low to medium impact expected 	The procurement of local, renewable energy reduces dependence on the global energy market dominated by fossil fuels, meets modern social and industrial climate expectations and contributes to climate action.

Strategic elements for enhancing climate-related opportunities for Comet's business

Based on expert projections, Comet expects the OSAT market (Out-sourced Assembly and Testing) to grow strongly by around 8% over the next two to five years. In response, Comet is working closely with a leading OSAT company to develop innovative solutions for integrating energy-efficient x-ray monitoring into microchip packaging processes. Although this project does not entail any financial risks, it offers significant opportunities for Comet to establish itself as a product and technology leader in this expanding market. In addition, opportunities are opening up for Comet in its traditional markets, such as the automotive, aerospace and security industries. Applying 100% inspection using x-rays can improve the quality of the manufactured parts to the point that standard safety allowances in the design process can be reduced. This in turn leads to a reduction in material and energy consumption.

Comet has recognized the importance of energy management and is pursuing a strategy to strengthen its own resilience in the energy procurement market. This strategy includes the transition to the exclusive use of local, renewable energy sources. Comet has already begun the

changeover to renewable electricity in recent years and plans to intensify these efforts in the near future. This strategic orientation is also reflected in the selection of new plants to be leased and in the collaboration with current lessors to drive forward the transition to renewable electricity. As a result of these efforts, the sites in Flamatt, Switzerland, Hamburg, Germany, and San Jose, California, have switched completely to renewable electricity. In the near term, Comet plans to implement a policy for electricity procurement in order to harmonize and standardize the procurement of renewable electricity at all sites.

Risk management

In 2024, Comet will integrate climate-related risks into its existing, multidisciplinary risk management process. This includes a regular review of the risk and opportunity assessment at each production site. Risks are identified for all time horizons in a top-down approach that covers the entire value chain from suppliers to customers. This identification is validated in collaboration with the divisional management and the site managers. The main risks are to be extracted, categorized in a matrix and assessed in terms of their probability of occurrence and the potential for harm. Comet plans to quantify the potential impact of these risks and opportunities in the near future.

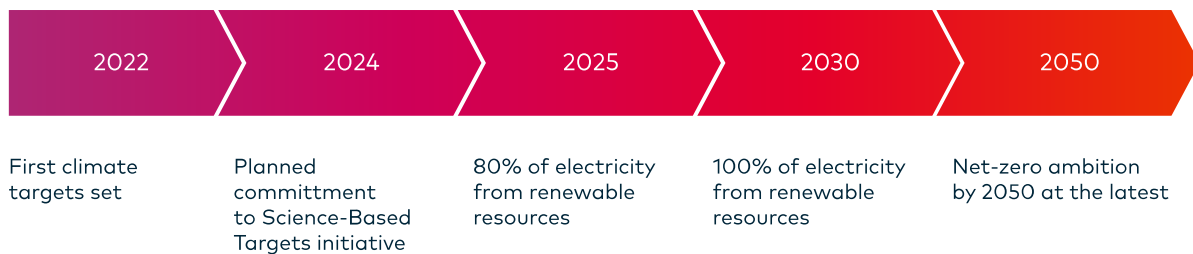
For risks that are classified as significant, Comet develops action plans to reduce both the probability of occurrence and the severity of the potential damage. The Executive Committee regularly reviews the effectiveness of these action plans and the entire risk portfolio and decides on any necessary adjustments. The Executive Committee informs the Audit Committee and Board of Directors of its findings. The necessary risk management measures are discussed and decided at the top management level, after which implementation is delegated to the respective departments and/or locations. In addition, the results of the risk management process are incorporated into the annual review and approval of the business strategy by the Board of Directors and are integrated into the documented risk management process implemented by the Executive Committee.

Metrics and targets

Since 2021, Comet annually publishes key performance indicators on greenhouse gas emissions and its general sustainability performance in accordance with the GRI Standards. The climate-related indicators are presented within the Sustainability Report, in the section "Report in Accordance with GRI Standards", under the heading "Environment". Comet's targets, too, are explained in the Sustainability Report, in the section "Climate action roadmap", heading "Targets and priorities".

Targets and priorities

On the path to our long-term net-zero ambition, we set our first climate-related targets in 2022. Over time, we will develop further targets, based on our package of measures, to help us monitor the efforts and measures we have adopted to achieve net zero by 2050 at the latest.



For 2024, we have set five priorities to progress in our CO₂ emission reduction activities and improve our processes in order to further increase transparency with regard to the quality of our sustainability reporting:

1. Take the next steps in our climate roadmap

- Refine the Scope 1, 2 and 3 data
- Implement pilot projects to determine the CO₂ footprint of our products (the product carbon footprint, or PCF)
- Integrate the eco-design approach in research, development and production

2. Set environmental targets for the individual Comet sites

3. Improve the collection of environmental data through use of a cloud-based software solution; focus on CO₂ emissions

4. Further develop the database to comply with the TCFD framework: governance, strategy, risk management, metrics and targets

5. Submit commitment to the Science-based Targets initiative (SBTi)

Integrating the eco-design approach in research, development and production

Eco-design principles are an important aspect of product development for Comet in the drive to reduce the environmental impact over the entire life cycle of the products. By implementing eco-design principles along the product value chain, we aim to improve the eco-friendliness of our products without compromising their functional properties. Measures already implemented at Group level include the reduction of process-related waste and of packaging materials, and the transition

to lighter or environmentally friendly packaging. However, the implementation of measures in product design, particularly in the semiconductor industry with its long life cycles and "copy exact" specifications, requires a longer time frame for implementation.

With the eco-design approach, we not only want to improve the environmental footprint of our products. We also strive to take social and economic aspects into account by systematically integrating them into the research and development processes and throughout the whole product life cycle. To this end, we recently launched an action plan that includes training for our employees and pilot projects on eco-design approaches to record and optimize the environmental footprint (PCF) of selected products. Gradually, the entire product range is to undergo systematic PCF analysis and eco-design is to be integrated into the development of new products within the next 12 months.

Report in Accordance with GRI Standards

In this Report in Accordance with GRI Standards, the management approaches and selected GRI disclosures relating to the material topics as presented in the Sustainability Report are explained in more detail.

Environmental

Materials Compliance

Materials compliance refers to compliance with certain standards and specifications in the selection and use of materials in products and processes. These standards can relate to various aspects, such as quality, safety, environmental sustainability, and health risks. For Comet as a manufacturer of industrial products, an indispensable requirement for doing business worldwide is compliance with regulations relevant to the environment and to market access – such as Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Restriction of Hazardous Substances (RoHS), and the Toxic Substances Control Act (TSCA) – as well as with legislation driven by international law and ethics, including conflict minerals legislation, the Dodd-Frank Act and Regulation (EU) 2017/821.

Report on conflict minerals

In accordance with the [“Ordinance on Due Diligence and Transparency with regard to Minerals and Metals from Conflict-Affected Areas and Child Labor \(DDTrO\) of 3 December 2021 \(status as of 1 January 2024\)”](#)

Comet has a responsibility to its customers to provide a supply chain of the highest quality that meets all established product performance standards and expectations. Our purchasing department maintains high standards in its supply chain by continuously evaluating new suppliers, and also by regularly assessing the performance of established suppliers. This is all the more important as the careful selection and maintenance of relationships with suppliers who adhere to ethical and sustainable practices contribute significantly to Comet's business success.

The purchasing group maintains a trust-based relationship with its suppliers and pursues long-term strategies and goals with them. It also creates an environment in which Comet and its suppliers can continue to develop without making even the slightest compromise regarding compliance with the Comet Group's [Supplier Code of Conduct](#) for ethically sound and legally compliant behavior. The purchasing team also ensures that this code is practiced and adhered to by suppliers.

To supplement the suppliers' self-declaration in the form of the signed [Supplier Code of Conduct](#), we work together with the external supply chain specialist Assent Compliance Inc. The Assent platform collects the data required for compliance with REACH, RoHS, Conflict Minerals and TSCA. With this solution, we can ensure that our suppliers comply

with all relevant laws and regulations. Suppliers who do not submit data to Assent will be contacted directly and asked to provide the required documentation. Where appropriate, we will work with our suppliers to identify measures for improvement. However, we also reserve the right to terminate the business relationship with suppliers under applicable laws if they do not comply with the Code or to take legal action against suppliers.

Comet imports individual raw materials and semi-finished products into Switzerland to manufacture its products, which are used in numerous industrial manufacturing processes in the semiconductor industry and in non-destructive testing. Only the metals imported by Comet in the reporting year under the designation "Other semi-manufactures and articles of tungsten" with customs tariff number 8101 99 00 pursuant to the Swiss DDTro, annex 1, part B are subject to the provisions on due diligence and reporting obligations. Of these, Comet imported 684 kg of these metals in the reporting year and thus exceeded the exemption limit of 350 kg.

The purchased tungsten and its alloys are used mainly by the Industrial X-ray Modules division as anodes and cathodes in x-ray tubes. These materials are added in small quantities to form alloys used in electronic components or in turning and milling tools.

With regard to imported tungsten and tungsten alloys with tariff number 8101 99 00, Comet has largely implemented the obligations arising from the following legislation:

- Regulation (EU) 2017/821 and its Delegated Regulation (EU) 2019/429
- Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502 on Conflict Minerals

Through the implementation of the obligations under Regulation (EU) 2017/821 and its Delegated Regulation (EU) 2019/429, Comet is exempt, as defined in DDTro, article 9, from the due diligence and reporting obligations in accordance with DDTro, annex 2, part A.

By strictly adhering to all aspects of materials compliance, we eliminate a wide range of risks that could have serious consequences. These include health risks to employees and customers, environmental damage caused by our products, and legal and financial consequences that may arise from non-compliance with existing laws and regulations. It is therefore in Comet's interest that all employees involved in materials compliance receive regular training on this topic and understand both the underlying rules and any consequences of non-compliance.

We are committed to providing our customers with the highest-quality supply chain that meets all established product performance standards and expectations. Our purchasing department maintains these high standards by continuously evaluating the performance of our established suppliers.

The responsibilities for the processes are mapped in the Comet Group's management system. Essentially, the specifications for materials compliance are made at the Group level by the Vice President of Global Op-

erational Excellence (VP GOE), who reports directly to the CEO. The VP GOE defines the compliance regulations together with the Group legal experts. The responsibility for implementation in the regions rests with the divisions, and accountability for it lies with the respective country general managers. Materials compliance activities are coordinated worldwide within the Quality & Excellence Board.

Environmental Management System and Compliance

The principle of sustainability is an integral part of Comet's corporate culture. We strive to offer our customers high-quality products and services while avoiding environmental risks and producing in ways that conserve resources. If these principles are disregarded, the company exposes itself to considerable risks. We use an environmental management system as a tool for managing our environmental footprint. Accordingly, we will define environmental targets for the individual sites based on ISO 14001.

Without such targets, it would be difficult to measure the achievability of our climate protection goals. We would also expose ourselves to legal and financial risks that could jeopardize our competitiveness in the long term. The principles of this approach are set out in the Comet Group's Quality, Environmental and Safety Policy, with supplementary information in the Code of Conduct.

While all our production and research and development sites are certified to ISO 9001:2015, Comet Yxlon (the IXS division) in Hamburg has gone further by designing and implementing an environmental management system in accordance with ISO 14001:2015. Smaller entities that perform only sales and marketing activities are not certified. To ensure compliance with environmental regulations, however, internal audits, customer and certification audits, benchmarking and best-practice applications are conducted at regular intervals at all production sites.

In 2023, Comet successfully achieved one single, Group-wide ISO 9001 certification. The Group-wide certification to ISO 14001 is to be tackled in stages over the course of 2024. The Vice President of Global Operational Excellence (VP GOE) is responsible for the performance of the Comet quality management system, including the process framework and architecture.

The VP GOE drives the definition, implementation, and improvement of Group-wide processes in close cooperation with the divisions. Among other responsibilities, the VP GOE sets minimum standards for non-financial KPIs and ensures certification and compliance with ISO standards. In this function, the VP GOE is supported by various boards and councils, such as the Operations Council and the Quality & Excellence Board, which includes the Q&E heads of the divisions. Accountability for environmental compliance rests with the respective country general manager, while responsibility for it lies with the division country manager. In the year under review, the Comet Group did not face any ongoing or completed legal proceedings for non-compliance with environmental laws or regulations. Likewise, no fines for environmental infractions were imposed on the company.

Energy Management and Carbon Emissions

All steps of the Comet value chain involve energy consumption and associated greenhouse gas emissions. Comet thus requires a stable and reliable electric power supply at its locations. Among the most significant risks are financial and operational risks from a possible power shortage, for which Comet was already preparing at the Flamatt site in the winter of 2022/2023, for example.

Energy consumption and emissions are also important in the upstream and downstream value chain, particularly in the production and transport of raw materials, semi-finished and finished products, as well as in the use of products by customers. In Comet's carbon footprint, these parts of the value chain contribute by far the most to total CO₂ emissions.

In the 2023 reporting year, Comet refined its environmental data collection process. This allows us to report consolidated Group-wide environmental KPIs for our production (Scope 1 and 2) as well as an initial quantitative estimate of Scope 3 emissions for the reporting year under CDP. As expected, Scope 3 emissions make up the lion's share, at about 61,000 tons or 90% of total CO₂ emissions.

Comet has developed a climate roadmap to meet short-, medium- and long-term CO₂ emission reduction targets and to progress toward the net-zero emission ambition by 2050. This roadmap also includes measures to increase the proportion of electricity from renewable sources in its energy mix. A renewables share of 80% is targeted for fiscal year 2025. By 2030, Comet plans to operate its sites exclusively with electricity from renewable sources. We have also taken the first steps in eco-design to further improve the environmental footprint of our products and to identify measures for the development of a reduction pathway along the entire value chain in accordance with SBTi requirements.

Numerous measures need to be implemented in order to achieve the net-zero target. With the knowledge gained from the refined environmental data collection and improvements in energy management, Comet intends to develop these measures using a systematic approach and implement them over the coming years. Thus, through detailed analysis, we want to understand the physical and transition risks arising from climate change – such as damage to buildings, production disruptions due to natural events, or new regulatory requirements – and identify measures to avoid the former as well as ensuring the readiness to comply with the latter. This issue will be addressed through our activities around TCFD and SBTi in the coming years.

Disclosures in accordance with GRI 302-1, GRI 305-1, 305-2

Environmental metrics ¹⁾		2023 ²⁾	2022
Energy consumption (total)	MWh	20,341	18,842
Electricity (total)	MWh	17,072	15,886
of which renewable	MWh	11,176	12,465
Heating (total)	MWh	2,352	2,038
Heating oil	MWh	137	147
Natural gas ³⁾	MWh	1,940	1,639
District heating	MWh	275	253
Fuels (total)	MWh	916	918
Diesel	MWh	630	704
Petrol	MWh	271	212
LPG	MWh	16	2
Greenhouse gas emissions (total)⁴⁾	tCO₂e	4,960	3,301
Greenhouse gas emissions (total)			
Scope 1 (total)³⁾	tCO₂e	655	598
Heating ³⁾	tCO ₂ e	428	369
Fuels	tCO ₂ e	227	229
Scope 2 (total)	tCO₂e	4,305	2,703
Electricity ⁵⁾	tCO ₂ e	4,256	2,657
District heating	tCO ₂ e	49	45

1)

Scope covers all of Comet's companies and locations

2) Figures 2023 were externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

3) Restated for Malaysia in 2022: 3,023 MWh / 918 tonnes of CO₂ / 652 tonnes of CO₂ reported in 2022

4) Annual Report. See chapter "Basis of calculations and definitions"

5) Calculations in accordance with the WRI/WBCSD Greenhouse Gas Protocol guidelines. Scope 1: GHG emissions from own sources, e.g., fuels. Scope 2: GHG emissions stemming from the production of electricity and district heating. Sources for emission factors: Defra & IEA.

With the exception of Flamatt, Hamburg, and San Jose greenhouse gas emissions associated with the production of electricity were accounted for in accordance with the "location-based approach" under the Greenhouse Gas Protocol Scope 2 standard. No emissions stem from electricity consumption in Flamatt, Hamburg, and San Jose, as the sites run entirely on renewable electricity. Considering only the location-based approach, electricity consumption across all sites would be responsible for 5,579 tonnes of CO₂e emissions in 2023.

Resource efficiency metrics ¹⁾		2023	2022
Waste (total)	t	1,940	2,444
Non-hazardous waste (total)	t	1,829	2,265
– Incineration	t	123	138
– Landfill	t	613	1,024
– Recycling	t	1,092	1,103
Hazardous waste (total)	t	112	179
– Incineration	t	1	1
– Recycling	t	110	178
Water consumption	m³	30,718	31,466

1)

Scope covers all of Comet's companies and locations

Monitoring and reducing Scope 2 emissions is a key part of our strategy for achieving our short and medium-term emissions targets. For Comet, these emissions mainly consist of indirect greenhouse gas emissions that arise from the consumption of purchased electricity.

In the fiscal year under review, Comet recorded an increase in Scope 2 emissions, which was largely due to the expansion of our production activity in Penang, Malaysia. The expansion, although commercially beneficial, led to an increased environmental impact for the Comet Group. In contrast to the increase in Penang, electricity consumption in Flamatt fell due to the correction in the semiconductor cycle and the associated lower production volumes.

With the exception of the Flamatt site, Comet leases the premises at all its locations. This complicates emission management to the extent that the availability of renewable electricity at some sites is nil or limited. This also applies to the planned Penang site in Malaysia.

We are actively striving to meet these challenges. We plan to convert our facilities in Aachen to green energy in 2024. We also plan to develop our new building in Penang as a climate-neutral unit.

Although lowering Scope 2 emissions is a complex challenge, especially in regions with limited availability of electricity from renewable sources, we are committed to sustainably reducing our environmental impacts. Through focused planning and coordinated efforts, we aim to significantly cut our Scope 2 emissions.

Social

Employer Attractiveness

In a rapidly changing world of work, a company's attractiveness as an employer is more important than ever. With the emergence of new working models, changing values among the younger generation and increasing competition for qualified employees, employer attractiveness is at the center of Comet's interest. Having strong appeal as an employer helps to attract talented and committed employees to Comet and retain them in the long term. This safeguards Comet's future innovative ability and productivity.

By contrast, if Comet does not appear attractive in the eyes of potential and current employees, it may face a number of challenges. If we do not succeed in positioning ourselves as an attractive employer, we will be exposed to significant risks with regard to our workforce. These risks range from difficulties in recruiting talent, to high turnover rates and losses in productivity and innovation.

Comet focuses on attracting and retaining young talent. Networking with talented young people while they are still students and winning them for Comet, as well as identifying and fostering existing talent within the company, are top priorities. Ensuring an attractive, flexible and inclusive working environment is the basis for this. A corporate culture that appeals to and retains both current and future employees is crucial.

Last year this included, for example, the anniversary celebrations to mark Comet's 75th anniversary at all global locations as a thank you to our employees for their loyalty.

Comet took part in the five-day BAM.LIVE 2023 education fair in Bern to support young people in their career selection phase in technical occupations. In addition, numerous pupils were able to get to look into our professions as part of career orientation day. University students had the opportunity to find out more about Comet and the exciting careers its offers at ETH Zurich's Polymesse job fair.

In the extremely challenging 2023 reporting year, Comet had no choice but to introduce short-time working for some of the employees at the Flamatt site. By making a compensating payment, Comet was able to ensure that the affected employees – mainly staff from manufacturing and related areas – did not suffer any loss of earnings.

Our trainees took part in the Horizon Hydrogen Grand Prix (H2GP), a global education project. The aim was to deepen their knowledge of sustainability and renewable energy. In a multidisciplinary team, they built their own remote-controlled hydrogen car on a scale of 1:10, with the aim of covering the longest distance. As a sponsor and employer, Comet supported this exciting learning project, which offers real scientific and technical challenges for the next generation.

The retention and engagement of our employees and their loyalty to the company play just as important a role as hiring talented new people. We therefore periodically conduct market benchmarking and perform employee pulse surveys to monitor the level of satisfaction and

engagement of our employees, and, when needed, initiate measures to strengthen it. To guide and support our recruiting of new talent, we conduct needs analyses, regularly review our policies and regulations and adapt them as appropriate.

We attach great importance to providing employees with good support beyond their working life at Comet. Here, the Human Resources team provides support during the transition to retirement as well as other departures from the company.

We regularly train our employees on subjects such as quality, continuous improvement, health and safety, products and sales, management and leadership, compliance and IT security. In 2023, we switched the majority of safety training courses to our online training tool. New employees are assigned courses when they join the company. In this way we ensure a global standard and raise awareness of occupational safety. Employees are asked to repeat the training courses at regular intervals and are informed of changes. In addition, twice a year we provide six-hour training courses on the subject of semiconductors to give staff solid insight into the semiconductor industry and our products and markets.

Disclosures in accordance with GRI 2-7

Composition of the workforce ¹⁾	Male			Female		
	2023 ³⁾	2022	±	2023 ³⁾	2022	±
Workforce by employment contract	1,146	1,348	- 15%	373	415	- 10%
Permanent	1,104	1,184	- 7%	356	374	- 5%
Temporary	42	164	- 74%	17	41	- 59%
Workforce by employment type ²⁾	1,104	1,184	- 7%	356	374	- 5%
Full-time	1,006	1,078	- 7%	288	304	- 5%
Part-time	98	106	- 8%	68	70	- 3%

¹⁾ Definition of categories see chapter "Basis of calculations and definitions"

²⁾ Permanent staff only

³⁾ Figures 2023 were externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

Workforce by region	Europe		Asia		North America	
	2023	2022	2023	2022	2023	2022
Total	968	1,061	314	324	237	378
Permanent	920	897	311	292	229	369
Temporary	48	164	3	32	8	9

Workforce by employment type ¹⁾	Europe		Asia		North America	
	2023	2022	2023	2022	2023	2022
Total	920	897	311	292	229	369
Full-time	754	723	311	291	229	368
Part-time	166	174	0	1	0	1

¹⁾ Permanent staff only

Workforce by category ¹⁾	Male			Female		
	2023	2022	±	2023	2022	±
Total	1,104	1,184	- 7%	356	374	- 5%
Production-related	587	663	- 11%	146	168	- 13%
Marketing and sales	155	162	- 4%	76	72	6%
General and administration	95	95	0%	100	101	- 1%
Research and development	267	264	1%	34	33	3%

¹⁾ Permanent staff only

Disclosures in accordance with GRI 401-1

Entries by gender ¹⁾	2023	2022	±
Total	179	346	- 48%
Male	127	264	- 52%
Female	52	82	- 37%

Turnover rate ²⁾	20.1%	11.5%	-
-----------------------------	-------	-------	---

¹⁾ Permanent staff only

²⁾ Turnover rate 2023 externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

Comet was forced to downsize its staff as a result of the correction in the semiconductor cycle and the generally weaker economy. This had a significant impact on the number of employees. Comet primarily reduced the number of temporary employees. Due to the weak order situation in the Plasma Control Technologies division, production-related jobs were disproportionately affected by the reduction. In contrast, Comet slightly increased the number of employees in research and development in order not to jeopardize its long-term technology leadership and to be prepared for the next upswing with new products. While the turnover rate among colleagues who left Comet involuntarily increased significantly, it remained almost the same for employees who left voluntarily in the reporting year.

Employee Health and Safety

Protecting employees' health and safety is a fundamental aspect of the working world that is essential both for the well-being of staff and the success of Comet. As part of the semiconductor value chain and thus of a high-tech industry, investing in effective health and safety measures is key for us. Our workforce is made up of highly qualified specialists, whether in production, sales, product management or research and development. Replacing these skilled people at short notice in the event of illness or absence due to (occupational) accidents is a major challenge. Comet experienced this during the pandemic. The rising number of sick colleagues coincided with full order books. It was therefore not easy for Comet to process the orders. In our cyclical industry, avoiding production downtime is vital. Taking a forward-looking approach to health and safety is both our responsibility to our employees, and an economic necessity for the long-term success of the company.

Our products and their manufacturing processes require appropriate attention and careful compliance with health and safety standards. The basic principles for this are set out in the Quality, Environmental and Health & Safety policy. Occupational safety is ensured, practiced and documented in our management system, which covers all employ-

ees, without exception, including external or temporary service providers, i.e., anyone working on our sites and in our buildings. Depending on the location, the organization of health and safety is tailored to the size of the unit and the potential hazards. It is essential to comply with local laws and regulations, such as Germany's Occupational Health and Safety Act ("Arbeitsschutzgesetz") and the rules of the German Social Accident Insurance system ("Deutsche Gesetzliche Unfallversicherung"), as well as, in Switzerland, the ten points of the Federal Coordination Commission for Occupational Safety ("Eidgenössische Koordinationskommission für Arbeitssicherheit", or EKAS).

Ensuring the health and safety of our employees is a top priority. For this reason, we strive to prevent occupational and other accidents. The use of lasers and chemicals as well as the emission of ionizing radiation in our manufacturing processes require appropriate measures to protect our employees from exposure to these potential hazards. In addition to these legal requirements, we also have an ethical and moral obligation.

The well-being of employees and customers is important to Comet's management. The organizational units of our company and all employees are responsible for safety and health at work. We are committed to complying with the appropriate laws and safety standards and conduct annual audits, depending on location and exposure. In addition, we report deficiencies or violations immediately so that they can be remedied as quickly as possible or avoided in the future, and we strive for improvements in safety at work.

Preventive measures are essential for us. Occupational health and safety are regularly addressed in training or development. Each employee should feel physically and mentally fit at work and in the work environment.

Comet USA organized this year's health and wellness fair in San Jose with external partners from the healthcare sector. At the stands, employees had the opportunity to take part in personal health tests and find out how healthier habits can help to improve their well-being. In Switzerland, a workshop for line managers was held at the Flamatt site together with the Swiss National Accident Insurance Fund (SUVA) under the tag line "Occupational safety starts at the top". Accidents can only be avoided reliably if the preventive measures are enforced. This is a matter for line managers, whose attendance at the workshop was high. As further measures to prevent accidents inside and outside the company, information and health tips are regularly posted on the social intranet, on subjects like sports, tripping, falls and – as the number setting for accidents – doing housework.

The achievement of and improvement in occupational health and safety objectives is ensured by continuous process monitoring and review of the effectiveness of these processes. Policies and guidelines are reviewed at regular intervals to ensure that the management system is up to date and effective. If necessary, they are amended. Such reviews are also, and especially, triggered by changes in customer requirements.

The responsibilities for health and safety are mapped in the Comet Group management system. Essentially, the country general manager ensures and is accountable for compliance with the local health and

safety standards and procedures. Their implementation is the responsibility of the division country general managers.

Reflecting the deeply entrenched awareness of occupational health and safety in our Group, we had no fatalities in our factories in the reporting year.



Occupational health and safety management in practice

Identifying work-related hazards and assessing related risks is of the utmost importance in reducing the number of accidents. In Switzerland, for example, a risk assessment is carried out by occupational physicians and other occupational safety specialists ("ASA specialists"). The risks are then classified according to the risk portfolio. To ensure the quality of these processes, a systematic revision of the portfolio is performed, and new jobs are integrated. The results then feed into the EKAS ten-point system for occupational health and safety management.

Should a work-related hazard or a hazardous situation still arise, employees and workers can report it by means of the two-part "Safer card". The first part is filled out by the employee or worker with his or her assessment, so that the hazard is immediately signposted. The second part is used by the manager to record a hazard report. The hazard must be eliminated within 24 hours. In addition, an employee may refuse to work if the situation is too dangerous for him or her, as Comet is committed to the safety charter of Suva, the Swiss Accident Insurance Agency ("Schweizerische Unfallversicherungsanstalt").

If a work-related incident occurs, an investigation is carried out. When appropriate, a root cause analysis is performed with the involvement of external specialists.

Comet has issued and integrated into its management system a comprehensive portfolio of policies and guidelines for all types of hazards. Notable examples are the Comet AG Safety Regulations, the policy for external companies/contractors, and the policy for dealing with non-ionizing radiation (NIR) and noise sources. Employees and workers are involved in the development, implementation and evaluation of the occupational health and safety management system through the application of element 8 of the ten-point EKAS, which deals with the inclusion of employees. The employees are included in the planning of measures, which is especially important when purchasing personal protective equipment. Upon joining the company, continual in-depth safety training is provided depending on the employee's role. In addition, occupational health and safety is regularly addressed in training and development.

Occupational health and safety metrics	2023	2022	±
Injuries ¹⁾	24	16	50%
Lost workdays due to work-related injuries	9	370	- 98%
Lost workdays due to illness	12,703	13,755	- 8%

¹⁾ Injury arising out of, or in the course of work. Definition of injury according to local labour law (if applicable), otherwise according to internal organizational provision: recordable injuries only.

The number of work-related injuries increased in the reporting year, but the number of working days lost as a result was lower. The number of working days lost due to sickness-related absences also fell.

Responsible Supplier Standards

We are committed to offering our customers the highest-quality supply chain that meets all established product performance standards and expectations. It is therefore important for Comet's commercial success to find and maintain the right suppliers. Our purchasing department maintains these high standards by continuously evaluating new suppliers, and also by regularly assessing the performance of our established suppliers. This process is all the more important as the careful selection and maintenance of relationships with suppliers who adhere to ethical and sustainable practices contribute significantly to Comet's business success. In this way, we reduce what we consider to be the limited risks – as described in detail in the statements on conflict minerals and child labor – associated with the selection of irresponsible suppliers, which are far-reaching and range from direct financial losses to legal difficulties and long-term reputational damage. This protects our own future viability and competitive strength and also makes a positive contribution to the development of the economy and society.

Comet's [Supplier Code of Conduct](#) (Supplier CoC), which has been in force since January 1, 2021, is based on the Responsible Business Alliance (RBA) Code of Conduct and sets out the basic requirements for Comet's suppliers and external service providers regarding their responsibility to their stakeholders and the environment. The [Supplier CoC](#) covers the following topics:

- Compliance with the law
- Prohibition of corruption and bribery
- Fair competition, antitrust laws and intellectual property rights
- Conflicts of interest
- Respect for the fundamental human rights of workers
- Prohibition of child labor
- Health and safety of employees
- Environmental protection
- Supply chain
- Materials compliance

By signing the [Supplier CoC](#), our suppliers agree to abide by the principles and requirements of this Code in addition to their obligations under other contracts with us. We reserve the right to amend the requirements of the [Supplier CoC](#) to reflect changes in our compliance policies.

Report on child labor

In accordance with the "[Ordinance on Due Diligence and Transparency with regard to Minerals and Metals from Conflict-Affected Areas and Child Labor \(DDTrO\) of 3 December 2021 \(status as of 1 January 2024\)](#)"

Due to its product and service portfolio, Comet assesses its risks with regard to violations of human rights, including child labor or respect for the basic human rights of employees, as low.

In its risk analysis, Comet bases its assessment of regional risks on the UNICEF Children's Rights and Business Atlas (as at June 2023), which assesses the risk of child labor for 195 countries and classifies them as "Basic", "Enhanced" and "Heightened". Comet also uses the United Nations Global Compact Business & Human Rights Navigator to assess the risk of child labor at a sector-specific level. These regulations show that Comet has exposure to China, Malaysia and the USA, which are rated as "Enhanced", as well as to the mining and electronics manufacturing sectors.

Through a survey directed to the country general managers, the Global Strategic Supply Chain Director and the supply chain directors of the divisions, Comet assessed whether there was a reasonable suspicion of child labor in the respective countries and the supply chains of the Comet Group and of the divisions in the reporting year. The internal survey conducted in 2023 – addressed to our country general managers and the Global Supply Chain Director of the Group and the divisions – did not reveal any reasonable suspicion of child labor as defined in ILO Convention No. 138 of June 26, 1973 or DDTrO, article 2, para. 1, lit. f.

As there are no reasonable grounds to suspect child labor based on the surveys, Comet is exempt from the due diligence and reporting obligations regarding child labor.

To minimize the risk of violations of the [Supplier CoC](#), we strive for long-term partnerships with reliable suppliers. However, if a supplier has knowledge of abusive behavior by the supplier or one of our employees, or if the supplier suspects such behavior, the supplier must inform us immediately. In addition, suppliers agree that the Comet Group, including our subsidiaries or designated agents (which includes third parties), may verify compliance with the [Supplier CoC](#), including through audits, on-site inspections of facilities or the review of books and records. In case of a nonconformance, we follow the procedure set out in the ISO 9001 standard. When appropriate, we work together with our suppliers to identify measures to resolve issues. However, we reserve the right to terminate the business relationship with suppliers (subject to applicable laws) if they fail to comply with the [Supplier CoC](#). We also reserve the right to take legal action against them.

Other important elements of the [Supplier CoC](#) are social and environmental aspects. By signing the Code, suppliers promise, for example, to:

- Promote equal opportunity and equal rights for employees regardless of color, ethnicity, national origin, social background, disabilities, sexual orientation, political or religious beliefs, gender or age
- Not tolerate any unacceptable treatment of workers, such as psychological violence, sexual harassment or discrimination, and
- Act in accordance with applicable legal requirements and international standards regarding environmental protection.

The fact that our initiatives, from sustainable procurement practices to the promotion of a diverse and inclusive workplace, do not go unnoticed by the outside world is reflected in our winning an ESG award from one of our largest customers. It recognized Comet for our consistent focus on our corporate values and our commitment to environmental, social and governance principles.

Diversity, Equity and Inclusion

Respect for diversity, equity and inclusion (DEI) is not only a matter of social responsibility, but also a key factor in Comet's business success and competitiveness. DEI initiatives help to create a positive and productive working environment that values and supports all employees, regardless of their individual identity. This leads to higher employee satisfaction, greater loyalty and ultimately to increased innovative strength and performance.

A failure to honor DEI can have a direct impact on employee satisfaction and talent retention. Furthermore, an inadequate DEI policy can damage Comet's reputation or even have legal and financial consequences for the company.

Our [Code of Conduct](#) as well as our equal opportunity employer policy state that no employee may be discriminated against by the company or by other employees. We are strongly committed to providing equal opportunity in every aspect of employment. Discrimination against employees by the company or by other employees on the basis of their nationality, ethnic origin, religion, gender, age, sexual orientation or any other protected characteristic is strictly prohibited. No incidents of discrimination occurred in the year under review.

When recruiting, we base our selection on objective criteria such as skills, qualifications, experience and other factors relevant to the position. We strive to maintain a recruitment process that is open, honest and fair and to build a team that represents a variety of backgrounds, perspectives and expertise.

We are convinced that focusing on DEI brings benefits for business growth (sales and profit), innovation, time to market, employee and customer satisfaction, and attracting and retaining top talent.

Comet received the "Fair-ON-Pay +" certification for gender pay equity for the Flamatt, Switzerland, site in 2021. The certification is valid for four years. Two years after passing the initial analysis, a maintenance analysis must be performed to confirm that the standard criteria are still met. Comet successfully passed the corresponding audit in 2023. We are on the right track and are committed to doing more regarding diversity, equity and inclusion in order to realize our full potential as the Comet Group.

Disclosures in accordance with GRI 405-1

Diversity in management (gender)	Male		Female	
	2023 ¹⁾	2022	2023 ¹⁾	2022
Headcount	163	177	35	36
Percentage	82.3%	83.1%	17.7%	16.9%

Diversity of governance bodies (gender) [%]	Male		Female	
	2023 ¹⁾	2022	2023 ¹⁾	2022
Board of Directors ²⁾	57	67	43	33
Executive Committee ³⁾	86	83	14	17

Diversity of governance bodies (age) [%]	<30		30-50		>50	
	2023 ¹⁾	2022	2023 ¹⁾	2022	2023 ¹⁾	2022
Board of Directors ²⁾	0	0	14	17	86	83
Executive Committee ³⁾	0	0	57	33	43	67

¹⁾ Figures 2023 were externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

²⁾ For the definition of "Board of Directors", see the section "Basis of calculations and definitions"

³⁾ For the definition of "Executive Committee", see the section "Basis of calculations and definitions"

Community Engagement

Our stakeholders expect Comet to go beyond its economic interests and make a positive contribution to society. Social engagement, whether through social projects, environmental protection initiatives or local partnerships, has become an important measure of Comet's responsibility and integrity. The double materiality analysis showed that the topic of social commitment is considered important but not central by management and stakeholders. Nevertheless, we are exposed to certain risks if we fail to engage in social matters. Social engagement is an important factor for Comet's long-term success, its legitimacy and thus for maintaining our social license to operate.

Our approach to direct engagement in society is twofold:

- At Group level, as a learning organization and a company with a long tradition of personnel training and development, we pave the way to success for dozens of trainees, interns and young skilled workers. In addition, we support institutions that have committed themselves locally or globally to a similar task in the area of technology and education. In the reporting year, we continued our financial sponsorship of the Technorama science center in Winterthur, Switzerland, and invited young people to experiment and get to know the world of science on Future Day at Comet in Flamatt, or in tinkering sessions in our company.
- At a local level, our regional teams and locations engage opportunistically in social causes. The impetus for this often comes from committed employees, who are encouraged and supported in their activities by the local management. Examples include active participation in the Applied Materials Silicon Valley Trot and the Lam Research Heart & Soles Run 2023, the proceeds from which go to several charitable organizations or educational institutions in the USA. Events for youths were also organized at the locations in Tokyo and Hamburg, where young people were introduced to our innovative technologies in a playful way.

We believe that technology can improve education. But conversely, we also believe that fair access to education improves the technology that ensures sustainable progress, safety and quality of life for us all. That is why we want to awaken enthusiasm for technology among the next generation. This is part of the basis of our commitment to socially and environmentally responsible action.

Governance

Ethics and Compliance

Ethics and compliance are critical pillars of Comet's success and integrity. While ethical standards define the moral behavior of a company, compliance refers to adherence to legal regulations. Meeting ethical and compliance standards is not only a necessity, but also a key element in maintaining the trust and loyalty of all stakeholders. Failure to comply with these standards can have serious legal and financial consequences, such as the loss of business opportunities or lengthy and expensive legal disputes, but also long-term reputational damage and therefore a loss of trust among customers, investors and other stakeholders.

Ethical behavior and compliance with laws and internal policies and specifications are non-negotiable. Our [Code of Conduct](#) therefore obliges all employees to comply with all laws and ethical standards. By using a reporting system called "Integrity Line", our employees can quickly and easily report concerns about actual or suspected misconduct that can affect our company or the wellbeing of people.

As part of the risk management process, for which the Board of Directors is responsible, the Group's risks are assessed twice a year by the Audit Committee. The most important points are reported to the Board of Directors and discussed as part of the general business risks. Material risks are systematically identified and recorded in a risk matrix.

At Group level, policies, processes, training, monitoring and continuous improvement measures are in place to ensure the highest level of ethics and compliance awareness among the workforce. Comet currently focuses on the following areas: (i) data protection, (ii) [Code of Conduct](#), (iii) anti-corruption and (iv) anti-trust.

Accountability for the implementation of these topics lies with the respective country general manager, while responsibility for it with the divisions. Compliance officers report to the country general manager and support the divisions and sites in implementing the compliance requirements. Where necessary, adjustments are made in accordance with legal requirements. The responsibility for issuing rules and policies for other compliance topics, such as health protection and occupational safety, lies with the respective country general manager, and these are implemented by the Country General Manager of the division to which the site is assigned.

In the year under review, we were not involved in legal proceedings, nor were issued significant fines, resulting from non-compliance with any laws or regulations.

Trade Compliance

Trade compliance is crucial in international business. It refers to compliance with all relevant laws and regulations governing trade between different countries. This includes customs regulations, export controls, sanctions and anti-corruption laws.

When selling our products worldwide, we comply with a wide range of laws and regulations. Under no circumstances may exports, brokering, transit or transfer by persons acting on behalf of our company violate these laws and regulations. It is of utmost importance that Comet and its products comply with all standards and requirements related to business, ethics, quality, and supplier and consumer protection. Failure to comply with these rules and regulations may result in delays in shipments to our customers, severe financial losses through fines, and other penalties imposed by international regulatory authorities. Non-compliance with trade regulations can also be perceived as a lack of integrity or as irresponsibility and affect the trust of customers, investors and business partners.

To ensure compliance, Comet has set up and implemented a Trade Compliance Policy which is integrated in the company's management system, lists the essential requirements and defines the roles and responsibilities within the global organization. In addition, it serves not only to promote and protect personal and corporate interests, but also to ensure compliance in the various supply chains. Under our management system, the country general manager is responsible for ensuring that trade in his or her country or region is conducted in accordance with Comet's Trade Compliance Policy and applicable regulations. The organizational design and implementation are the responsibility of the country general manager. To meet the specific trade compliance requirements, a trade compliance officer is appointed for each country. This officer is responsible for trade compliance and is supported by trade specialists. The trade specialists and the trade compliance officer have the authority to stop transactions. We reinforce trade compliance through annual training courses for the appropriate employees.

Trade compliance is crucial for the long-term success and sustainability of a company. It not only protects against legal and financial risks, but also strengthens trust and credibility among stakeholders. In an increasingly complex and regulated global economy, it is important that companies take proactive measures to ensure their business practices comply with trade regulations. By complying with these regulations, companies can minimize risks, protect their reputation and place their business activities on a solid and sustainable footing.

In 2023, we were not defendants in any legal proceedings nor were issued any significant fines for non-compliance with trade-related laws and regulations.

Economic

Customer Loyalty and Satisfaction

The needs of our customers determine our actions. As a market leader in radio frequency power and x-ray technology, we serve a wide range of customers, from global market leaders to SMEs. Regardless of our customers' size and business sector, we follow four basic principles in serving each one: We ask what problem really needs to be solved and why; we inspire through our expertise; we provide or co-create solutions with a clear benefit; and we deliver what we promise, while saying early on when we cannot meet a need.

In order for us to deliver on these principles successfully, customer proximity and customer loyalty are crucial. In addition to best-in-class products, a strong R&D organization, local presence with skilled sales and service teams in our key markets in Europe, North America and increasingly in Asia, another pillar supporting sustainable business relationships with our customers is our effective and efficient after-sales support.

Comet invests in the satisfaction and loyalty of its customers on a daily basis, as these factors are crucial to its long-term success. The risks that arise from a lack of customer satisfaction and loyalty are manifold and can have a profound impact on Comet. They range from direct financial losses to damage to the brand image and internal challenges. These risks make it all the more necessary for us to invest in customer satisfaction and loyalty. We take every opportunity to stay in close contact with our customer base, in order to share ideas with customers and to understand and anticipate technological developments. This exchange takes place at various levels: in direct interactions between the account manager and the customer, in joint teams that solve specific problems, at trade shows where we can present innovations from our portfolio, or at trade conferences.

In the year under review, for example, Comet took part in the regional trade shows of the semiconductor industry association SEMI in the USA, Europe, China, Taiwan and South Korea to promote its latest innovations, above all the Synertia® radio frequency power platform. At Productronica, the world's leading trade show for electronics manufacturing, the IXS division presented its revolutionary CA20 x-ray system for 3D x-ray inspection in advanced packaging, tailored to the needs of the semiconductor industry.

Product & Technology Leadership

For some of the most innovative customers, we manufacture products at the frontier of what is technologically feasible. With our leading-edge technologies, we seek to be the preferred partner for the most innovative companies in our markets. And we work hard to defend and expand our technology and product leadership in order to remain among the leaders in our markets in the long term. Should we not succeed in this, we would be faced with various risks that could detract from our market position, our ability to innovate and our long-term viability.

Product leadership is not defined by technology alone. Rather, achieving it is the result of implementing key strategic decisions such as gain-

ing market leadership for selected products or focusing on standardized products (modular standardization). These strategic issues are regularly coordinated with the Technology Committee of the Board of Directors.

To maintain product and technology leadership in our markets, we invest between 11% and 13% of our sales in R&D every year. Using funds effectively and efficiently, we employ 301 people in R&D, or about 21% of our total workforce, with proven R&D specialists working at all organizational levels and in all functions.

We measure our targets in terms of market share, on which we collect and analyze data regularly based on internal and external sources. We use other key performance indicators to measure how successfully we sell newly launched products. With the exception of external market share data, these KPIs are presented to and discussed with the Executive Committee at the quarterly business review meetings.

The esteem in which Comet is held as one of the long-standing and leading technology partners in plasma control is underlined by the receipt of two awards from major customers in Europe and Asia.

Product Impact

Our products can impact society and the environment in many ways. For society, our technologies play an essential role in the manufacturing of semiconductor chips and sensors that are the central building blocks of the digital world. And environmentally, the impact begins with the sourcing of raw materials and continues through the product use stage to the end of the product's life cycle.

For Comet, assessing environmental impact is becoming more and more important. This is partly because customers are increasingly looking for products that have as little impact on the environment as possible, and partly because, going forward, we will give even greater weight to this aspect in the selection of our suppliers in order to improve our own environmental footprint.

If we underestimate the impact of our products, we expose ourselves to risks that can have serious consequences. If products cause damage or do not comply with legal safety standards, Comet could face product liability claims. Such legal disputes are not only costly, but also tie up valuable resources and time. In addition, fines, claims for damages and product recalls can lead to considerable financial burdens. Comprehensive assessment and continuous monitoring of product impact are therefore essential in order to minimize risks, safeguard customers' trust and protect the integrity of the company in the long term.

In the fiscal year under review, Comet intensified its efforts in the eco-design initiative. The aim was to develop a deeper understanding of how to carry out eco-design analyses. To this end, cross-divisional workshops were held with employees from all three divisions and the central functions. As a next step, pilot projects are planned to check adherence to eco-design standards in existing products. The results of these projects should help to reduce the environmental footprint of our products. They also aim to assess and improve the contribution of our products to achieving the goals of the Science Based Targets initiative (SBTi) with regard to climate change.

Product Quality & Compliance

The quality of our products and their conformity with all product-related regulations and directives are a fundamental element of our corporate culture and the basis for our business success. Our quality principles are an important argument for our customers. We are committed to providing our customers with high-quality products and services. Our products are competitive, defect-free, safe and environmentally sound in their application and thus make a decisive contribution to the success of our customers. Therefore, we strive to avoid any risk that could compromise quality.

The risks associated with poor quality or violations of legal regulations can lead to investigations by supervisory authorities, penalties and even criminal prosecution. In addition, customers or other affected parties may file claims for damages, leading to further financial burdens and a tarnished public image.

In addition to ensuring the quality of our products on the market, we are committed to continuous improvement, which begins as early as the planning stage for new products, activities and processes. Our management sets division- and location-specific quality targets, provides the corresponding resources and structures and regularly reviews target achievement. Internal audits, customer and certification audits, benchmarks and best-practice applications all contribute to the continuous further improvement of the quality management system.

The process responsibilities are mapped in the Comet Group's management system. Product quality and conformity are essentially defined by the divisions, with responsibility assumed by the division country general manager and accountability resting with the respective country general manager.

Operational Excellence

The Comet Group wants to become more efficient, more flexible, and faster. Our goal is to develop into a highly profitable company with clear market leadership in each of the markets we serve. A key lever in achieving this is the pooling of resources and strengthening of the organization. Focused on global collaboration, we will continue to improve business and operational excellence.

Operational excellence is a process set out in the management system and which provides the framework for making Comet a sustainable, high-performing organization. Operational excellence is essential for Comet to remain efficient, competitive and profitable. A lack of this quality can have far-reaching negative effects on our entire business activities.

The Group function of Quality & Excellence is responsible for the management system, including the process framework and architecture. Within this framework, the following tasks, among others, fall into this area of responsibility:

- Define, implement and improve Group-wide processes in close cooperation with the divisions
- Set minimum standards for non-financial KPIs for the Group and the divisions
- Monitor the state of the overall management system and prioritize improvements

- Ensure certification and compliance with ISO standards throughout the Group
- Lead the Quality & Excellence Board to drive and support collaboration and execution between divisions and corporate functions

Target achievement is monitored on the basis of defined KPIs such as the number of successfully implemented improvement projects, automated availability of the selected KPIs (for instance, cost of goods sold per unit produced, operations staff costs in percentage of net sales, and on-time delivery performance in filling customer orders), and the certification of all Comet sites to ISO 9001.

The Quality & Excellence Board (Q&E Board) acts as a committee for the person in charge of the Quality & Excellence group function. The Q&E Board supports the VP of Global Operational Excellence in implementing projects and initiatives in the divisions and corporate functions.

In the Global Operational Excellence (GOE) Group function, we combine the logistics, trade compliance, real estate, environment, health and safety and facility management functions. Through this center of expertise for all matters relating to operational excellence, we leverage our power as one company by optimally aligning our business activities worldwide and learning from each other.

GRI Content Index



CONTENT INDEX
ESSENTIALS SERVICE

2024

Comet Holding AG has reported in accordance with the GRI Standards for the period 1 January 2023 to 31 December 2023. For the Content Index – Essentials Service, GRI Services reviewed that the GRI content index has been presented in a way consistent with the requirements for reporting in accordance with the GRI Standards, and that the information in the index is clearly presented and accessible to the stakeholders. The service was performed on the English version of the report.

GRI 1 used: GRI 1: Foundation 2021

Applicable GRI Sector Standard: none

General Disclosures

GRI Standard	Disclosure	Location / information	Omission (Requirements omitted (RO), Reason (R), Explanation (E))
The organization and its reporting practices			
GRI 2: General Disclosures 2021	2 – 1 Organizational details	Comet Holding AG <u>Corporate Governance Report, Group structure and shareholders</u> Comet Holding AG, Herrengasse 10, 3175 Wünnewil-Flamatt, Switzerland <u>Annual Report, Review of 2023</u>	
	2 – 2 Entities included in the organization's sustainability reporting	<u>Consolidated financial statements, 02.4 Consolidation</u> All entities in the financial reporting are also included in sustainability reporting	
	2 – 3 Reporting period, frequency and contact point	Annually, fiscal year from Jan 1, 2023, to Dec 31, 2023 <u>Corporate Governance, Contacts</u>	
	2 – 4 Restatements of information	Restatement related to energy consumption	
	2 – 5 External assurance	<u>Limited assurance on selected KPIs</u>	
Activities and workers			
GRI 2: General Disclosures 2021	2 – 6 Activities, value chain and other business relationships	<u>Strategy, The Comet Group</u> <u>Notes to the consolidated financial statements, 01 Nature of the business activities</u> <u>Consolidated financial statements, 02.4 Consolidation Report in Accordance with GRI Standards, Responsible Supplier Standards</u>	
	2 – 7 Employees	<u>Consolidated financial statements, 04.1 Operating segments</u> <u>Report in Accordance with GRI Standards, Employer Attractiveness</u> <u>Separate Financial Statements of Comet Holding AG, Number of full-time equivalents</u>	
	2 – 8 Workers who are not employees	<u>Report in Accordance with GRI Standards, Employer Attractiveness</u>	
Governance			
GRI 2: General Disclosures 2021	2 – 9 Governance structure and composition	<u>Corporate Governance, Board Committees</u> <u>Corporate Governance, Board of Directors</u> <u>Sustainability Report, Sustainability governance and organization</u>	
	2 – 10 Nomination and selection of the highest governance body	<u>Corporate Governance, Board election and terms, internal organization</u>	
	2 – 11 Chair of the highest governance body	The Chair of the Board of Directors is not a senior executive in the organization	
	2 – 12 Role of the highest governance body in overseeing the management of impacts	<u>Corporate Governance, Board of Directors</u>	

		<u>Sustainability Report, Sustainability governance and organization</u>
	2 – 13 Delegation of responsibility for managing impacts	<u>Sustainability Report, Sustainability governance and organization</u>
	2 – 14 Role of the highest governance body in sustainability reporting	<u>Sustainability Report, Sustainability governance and organization</u>
	2 – 15 Conflicts of interest	<u>Board of Directors: Corporate Governance, Disclosure of potential conflicts of interest</u> <u>Executive Committee: Corporate Governance, Disclosure of potential conflicts of interest</u>
	2 – 16 Communication of critical concerns	Through AGM or other functions (e.g., IR) via CEO. Regular conversations between CEO, CFO and multiple stakeholders.
	2 – 17 Collective knowledge of the highest governance body	The majority of the members of the Board of Directors are members of the board or management of other listed companies that are advanced in sustainability. Quarterly report on sustainability developments to the Board.
	2 – 18 Evaluation of the performance of the highest governance body	<u>Corporate Governance, Board of Directors</u> Board of Directors conducted a self-assessment with an external Board Advisor in 2023
	2 – 19 Remuneration policies	<u>Compensation report, 03 Determination of compensation and compensation principles</u> <u>Corporate Governance, Nomination & Compensation Committee</u>
	2 – 20 Process to determine remuneration	<u>Compensation report, 03.1 Determination of compensation</u>
	2 – 21 Annual total compensation ratio	Comparable ratio of 20; total compensation was down in 2023 vs. 2022 (lower variable compensation)
Strategy, policies and practices		
GRI 2: General Disclosures 2021	2 – 22 Statement on sustainable development strategy	<u>Sustainability Report, Statement of the CEO</u>
	2 – 23 Policy commitments	<u>Report in Accordance with GRI Standards, Supplier Code of Conduct</u> <u>Report in Accordance with GRI Standards, Trade Compliance</u> <u>Report in Accordance with GRI Standards, Ethics and Compliance</u>
	2 – 24 Embedding policy commitments	<u>Report in Accordance with GRI Standards, Supplier Code of Conduct</u> <u>Report in Accordance with GRI Standards, Trade Compliance</u> <u>Report in Accordance with GRI Standards, Ethics and Compliance</u> Sustainability Report, Report on child labor
	2 – 25 Processes to remediate negative impacts	<u>Report in Accordance with GRI Standards, Supplier Code of Conduct</u> <u>Report in Accordance with GRI Standards, Trade Compliance</u> <u>Report in Accordance with GRI Standards, Ethics and Compliance</u>
	2 – 26 Mechanisms for seeking advice and raising concerns	<u>Corporate Governance, Integrity line</u>
	2 – 27 Compliance with laws and regulations	<u>Report in Accordance with GRI Standards, Ethics and Compliance</u>

		Report in Accordance with GRI Standards, Environmental Management System and Compliance
		Report in Accordance with GRI Standards, Trade Compliance
		Report in Accordance with GRI Standards, Employee Health & Safety
	2 – 28 Membership associations	SEMI (global industry association that encompasses the entire electronics manufacturing and supply chain), EUROBAT, JIMA (Japan Inspection Instruments Manufacturers' Association, Swiss Malaysian Chamber of Commerce

Stakeholder engagement

GRI 2: General Disclosures 2021	2 – 29 Approach to stakeholder engagement	Sustainability Report, Material Topics
	2 – 30 Collective bargaining agreements	Less than 5% of employees are covered by bargaining agreements. For employees not covered by collective bargaining agreements, we regularly benchmark the working conditions and terms of employment against organizations with collective bargaining agreements. Overall, our working conditions and terms of employment are superior compared to organizations with collective bargaining agreements.
		Report according to GRI Standards, Employer Attractiveness

Material Topics

GRI 3: Material Topics 2021	3 – 1 Process to determine material topics	Sustainability Report, Material topics
	3 – 2 List of material topics	Sustainability Report, Material topics

Environmental

Materials Compliance

GRI 3: Material Topics 2021	3 – 3 Management of material topics	Report in Accordance with GRI Standards, Materials compliance
-----------------------------	-------------------------------------	---

Environmental Management System and Compliance

GRI 3: Material Topics 2021	3 – 3 Management of material topics	Report in Accordance with GRI Standards, Environmental Management System and Compliance
-----------------------------	-------------------------------------	---

Energy Management and Carbon Emissions

GRI 3: Material Topics 2021	3 – 3 Management of material topics	Report in Accordance with GRI Standards, Energy Management and Carbon Emissions
GRI 302: Energy 2016	302 – 1 Energy consumption within the organization	Report in Accordance with GRI Standards, Energy Management and Carbon Emissions
	302 – 4 Reduction of energy consumption	Report in Accordance with GRI Standards, Energy Management and Carbon Emissions
	302 – 5 Reduction in energy requirements of products and services	Sustainability Report, Climate action roadmap Sustainability Report, Climate action roadmap
GRI 305: Emissions 2016	305 – 1 Direct (Scope 1) GHG emissions	Report in Accordance with GRI Standards, Energy Management and Carbon Emissions (table)
	305 – 2 Energy indirect (Scope 2) GHG emissions	Report in Accordance with GRI Standards, Energy Management and Carbon Emissions (table)
	305 – 5 Reduction of GHG emissions	Sustainability Report, Climate action roadmap

Social

Employer Attractiveness

GRI 3: Material Topics 2021	3 – 3 Management of material topics	Report in Accordance with GRI Standards, Employer Attractiveness
-----------------------------	-------------------------------------	--

GRI 401: Employment 2016	401 – 1 New employee hires and employee turnover	<u>Report in Accordance with GRI Standards, Employer Attractiveness</u>
GRI 404: Training and Education 2016	404 – 2 Programs for upgrading employee skills and transition assistance programs	<u>Report in Accordance with GRI Standards, Employer Attractiveness</u>
Employee Health and Safety		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
GRI 403: Occupational Health and Safety 2018	403 – 1 Occupational health and safety management system	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 2 Hazard identification, risk assessment, and incident investigation	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 3 Occupational health services	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 4 Worker participation, consultation, and communication on occupational health and safety	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 5 Worker training on occupational health and safety	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 6 Promotion of worker health	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 8 Workers covered by an occupational health and safety management system	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403 – 9 Work-related injuries	<u>Report in Accordance with GRI Standards, Employee Health and Safety (table)</u>
Responsible Supplier Standards		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Responsible Supplier Standards</u>
GRI 308: Supplier Environmental Assessment 2016	308 – 1 New Supplier Screening Using Environmental Criteria	<u>Report in Accordance with GRI Standards, Responsible Supplier Standards</u>
GRI 408: Child Labor 2016	408 – 1 Operations and suppliers at significant risk for incidents of child labor	<u>Sustainability Report, Report on child labor</u>
GRI 409: Forced or Compulsory Labor 2016	409 – 1 Operations and suppliers at significant risk of incidents of forced or compulsory labor	<u>Sustainability Report, Report on child labor</u>
GRI 414: Supplier Social Assessment 2016	414 – 1 New suppliers that were screened using social criteria	<u>Report in Accordance with GRI Standards, Responsible Supplier Standards</u>
Diversity, Equity and Inclusion		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Diversity, Equity and Inclusion</u>

GRI 405: Diversity and Equal Opportunity 2016	405 – 1 Diversity of governance bodies and employees	<u>Report in Accordance with GRI Standards, Diversity, Equity and Inclusion</u>
Community Engagement		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Community Engagement</u>
GRI 413: Local Communities 2016	413 – 1 Local Community Engagement, Impact Assessments, and Development Programs	<u>Report in Accordance with GRI Standards, Community Engagement</u>
Governance		
Ethics and Compliance		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Ethics and Compliance</u>
GRI 205: Anti-Corruption 2016	205 – 3 Confirmed incidents of corruption and actions taken	<u>Report in Accordance with GRI Standards, Ethics and Compliance</u>
GRI 206: Anti-competitive Behavior 2016	206 – 1 Legal actions for anti-competitive behavior	<u>Report in Accordance with GRI Standards, Ethics and Compliance</u>
Trade Compliance		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Trade Compliance</u>
Economic		
Customer Loyalty and Satisfaction		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Customer Loyalty and Satisfaction</u>
Product and Technology Leadership		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Product and Technology Leadership</u>
Product Impact		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Product Impact</u>
Product Quality and Compliance		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Product Quality and Compliance</u>
Operational Excellence		
GRI 3: Material Topics 2021	3 – 3 Management of material topics	<u>Report in Accordance with GRI Standards, Operational Excellence</u>
GRI 201: Economic Performance 2016	201 – 1 Direct economic value generated and distributed	<u>Annual Report, Performance</u>
		<u>Annual Report, Comet Group key consolidated financial results</u>

Basis of calculations and definitions

Period and base year

The reporting period covers the period from January 1 to December 31, 2023.

Reporting boundary

The environmental key figures include all locations and companies in Comet's scope of consolidation as listed in the annual report. Compared to the 2022 reporting year, the companies in the scope of consolidation have remained unchanged.

Comet has made the following significant changes to its locations for the calculation of environmental indicators in the 2023 financial year:

- In San Jose, California (USA), the four existing locations were merged into one new location in San Jose in the 2023 financial year
- The location in Beijing (China) was largely integrated into the two locations in Shanghai (China) in the course of the 2023 financial year
- The Hudson, Ohio (USA) site was closed during the 2022 financial year and integrated into the Shelton, Connecticut (USA) site

Restatements

The figure for natural gas consumption in Malaysia was corrected from the figure published in the 2022 Annual Report (3,023 MWh) to 1,639 MWh. This resulted in a correction of Scope 1 emissions from 918 tonnes of CO₂ in the 2022 Annual Report to 598 tonnes and of emissions caused by natural gas from 652 tonnes of CO₂ to 369 tonnes. The reason for the restatement is an erroneous classification of the energy source for the HVAC system (heating, ventilation, cooling) at the Penang site in Malaysia. Further deviations in the reported figures in this year's report compared to last year's report are considered insignificant (<10%).

Data sources and data collection

With the exception of the Flamatt site in Switzerland, which is owned by Comet, all of the company's other sites are leased. As a result of these leases, not all the necessary data on energy consumption for the financial year is available in time for the end of the reporting period.

In order to nevertheless gain a comprehensive overview of energy consumption at these locations, the data collection for Scope 1 and Scope 2 emissions calculations is based on various sources: these include invoices received during the year, extrapolations based on the latest available data or estimates based on the previous year's figures.

Scope 1 and Scope 2 data is collected every six months through surveys at all locations. The first survey takes place between November of the reporting year and January of the following year and forms the basis for the annual report. This is based on current information, with extrapolations made by Group Controlling in cooperation with the locations or estimates based on employee numbers and the size of the rented operating space being used in the event of missing data. A second survey is carried out in the second quarter of the following year

based on the figures actually reported for the reporting year in order to check the provisional figures and, if necessary, correct them retrospectively in the next annual report if there are significant deviations. These figures are used for the entries in the CDP Climate Change Questionnaire.

Internal costs, external invoices and information from service providers as well as data provided by the landlord are used to record water consumption, waste volumes and energy consumption for heating and vehicles. If such sources are not available, an estimate is made based on the number of employees.

Data control and data plausibility

Plausibility checks of the reported data are systematically ensured through year-on-year comparisons. For each data collection, as described in the "Data sources" section, those responsible for the locations check the data against the figures for the reporting year and the previous year. Any discrepancies identified are reported to Group Controlling. In the case of values outside a tolerance of ($\pm 20\%$), a detailed review is carried out. Group Controlling then works with the respective site managers to check and correct such data points. If the deviation is outside the tolerance and is confirmed, a correction is made in the annual report for the following reporting year.

Methodology Data evaluation and emission calculations

The data points collected are read in and consolidated by Sustainserv GmbH using a semi-automated Excel program. In order to ensure a uniform analysis, the different measurement units of the individual questionnaires, such as currencies, weights and performance units, are converted into standardized measurement units using conversion tables. This process complies with the guidelines of "The GHG Protocol Corporate Accounting and Reporting Standard".

Scope 1

For the calculation of Scope 1 emissions, which relate to direct emissions from the company's own energy sources, the specific consumption data is summarized and calculated using the current conversion factors from the DEFRA 2023 database. These emission factors are adjusted annually to ensure accuracy and timeliness.

Scope 2 location-based

For the location-based Scope 2 emissions, which record the indirect emissions from the energy consumption of the locations, the calculation is carried out by multiplying the specific consumption data with the country-specific energy mixes, based on data from the IEA and eGRID 2023 databases.

Scope 2 market-based

For the market-based Scope 2 emissions, which calculate energy consumption based on the actual energy mixes and conversion factors of the energy suppliers, the emission factors, where available, are updated annually directly by the companies with the respective energy suppliers. Comet will make additional efforts in the coming years to obtain utility-specific emission factors and further develop Scope 2 reporting on this basis.

Once the data has been evaluated, the calculations are randomly checked before the corresponding tables and figures are published in the annual report.

External audit

The contents of the Sustainability Report 2023 marked in the respective places were subjected to an external audit by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards.

Definitions

Employees: Persons who are in a direct employment relationship with the company under national law or practice. Excludes persons who work on another basis, such as consultants, contractors, temporary workers, self-employed persons, etc.

Permanent employees: Employees with an open-ended contract that is not limited by time and/or performance of duties and whose expiry requires certain measures on the part of the employee/employer in accordance with national law or practice. Internal categories: 1A (CEO), 1B (member of the Executive Committee), 2A (General Manager), 2B (member of Division Management), 2C (Senior Vice President), 2D (member of Group Functions Management), 2E (Vice President), 2F (Senior Director), 3A (Director), 3B (Senior Specialist), 4A (Manager), 4B (Team Leader), 4C (Specialist), 4D (Junior Specialist), 6A (salaried employees), 6B (hourly-paid employees).

Temporary employees: Employees with a contract for a limited period of time (fixed-term contract) that ends at the end of the specified period or after completion of a specific task or event. Internal categories: 6A (apprentices), 6B (interns/trainees), as well as all other categories if only a fixed-term employment contract exists.

Full-time employees: employees whose working hours are defined per period in accordance with national laws or practices.

Board of Directors: Comprises all members of the [Board of Directors of Comet Holding AG](#).

Executive Committee (EC): Comprises all members of the [Executive Committee of the Comet Group](#) in the internal categories 1A (CEO) and 1B (other members of the EC).

Regions: Europe - Denmark, Germany, Switzerland / Asia - China, Japan, Malaysia, South Korea, Taiwan / North America - Canada, USA

Fluctuation: Rate at which employees leave the organization.

Voluntary turnover: if the employee leaves the company of their own free will and this cannot be foreseen/prevented by the company.

Involuntary turnover: if the employer causes the employee to leave the company or the employee leaves the company for a reason independent of the employer (illness/death, etc.).

Calculation employee turnover:

- Total [in %]: $(\text{total number of involuntary leavers} + \text{total number of voluntary leavers}) / \text{staff} \times 100$
- Voluntary [in %]: $(\text{total number of voluntary leavers} / \text{staff}) \times 100$
- Involuntary [in %]: $(\text{total number of involuntary leavers} / \text{staff}) \times 100$



Ernst & Young AG
Schanzenstrasse 4a
P.O. Box
CH-3001 Bern

Phone: +41 58 286 61 11
www.ey.com/en_ch

To the Board of Directors of
Comet Holding Ltd, Flamatt

Berne, 1 March 2024

Independent Assurance Report on selected KPIs in the Sustainability Report 2023

We have been engaged to perform a limited assurance engagement (the engagement) on selected metrics (the KPIs) disclosed in COMET Holding AG's (the Company's) Sustainability Report 2023 and the Report on non-financial matters 2023 (the report) for the reporting period from 1 January to 31 December 2023.

The metrics and information that we reviewed are indicated in the Sustainability Report on pages 148 – 199 and in the Report on non-financial matters 2023 on pages 203 - 236 through a corresponding footnote.

Other than as described in the preceding paragraph, which sets out the scope of our engagement, we did not perform assurance procedures on the remaining information included in the report, and accordingly, we do not express a conclusion on this information.

Applicable criteria

The Company defined as applicable criteria (applicable criteria):

- ▶ Global Reporting Initiative Sustainability Reporting Standards (GRI Standards).

A summary of the standards is presented on the GRI homepage. We believe that these criteria are a suitable basis for our limited assurance engagement.

Responsibility of the Board of Directors

The Board of Directors is responsible for the selection of the applicable criteria and for the preparation and presentation, in all material respects, of the disclosed KPIs in accordance with the applicable criteria. This responsibility includes the design, implementation, and maintenance of internal control relevant to the preparation of the KPIs that are free from material misstatement, whether due to fraud or error.

Independence and quality control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including International Independence Standards) of the International Ethics Standards Board for Accountants (IESBA Code), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

Our firm applies International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding



2

compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

Our responsibility

Our responsibility is to express a conclusion on the above mentioned KPIs based on the evidence we have obtained. We conducted our limited assurance engagement in accordance with the International Standard on Assurance Engagements (ISAE) 3000 Assurance Engagements Other than Audits or Reviews of Historical Financial Information. This standard requires that we plan and perform this engagement to obtain limited assurance about whether the KPIs in the report are free from material misstatement, whether due to fraud or error.

Summary of work performed

Based on risk and materiality considerations we have undertaken procedures to obtain sufficient evidence. The procedures selected depend on the practitioner's judgment. This includes the assessment of the risks of material misstatements in the above mentioned KPIs. The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in scope than, for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had we performed a reasonable assurance engagement.

Although we considered the effectiveness of management's internal control when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal control. Our procedures did not include testing control or performing procedures relating to checking aggregation or calculation of data within IT systems.

The Greenhouse Gas (GHG) quantification process is subject to scientific uncertainty, which arises because of incomplete scientific knowledge about the measurement of GHGs. Additionally, GHG procedures are subject to estimation (or measurement) uncertainty resulting from the measurement and calculation processes used to quantify emissions within the bounds of existing scientific knowledge.

Our limited assurance procedures included, amongst others, the following work:

- ▶ Assessment of the suitability of the underlying criteria and their consistent application
- ▶ Interviews with relevant personnel to understand the business and reporting process, including the sustainability strategy, principles and management
- ▶ Interviews with the Company's key personnel to understand the sustainability reporting system during the reporting period, including the process for collecting, collating and reporting the KPIs
- ▶ Checking that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the applicable criteria
- ▶ Analytical review procedures to support the reasonableness of the data
- ▶ Identifying and testing assumptions supporting calculations
- ▶ Testing, on a sample basis, underlying source information to check the accuracy of the data


We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our limited assurance conclusion.



Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the KPIs for the reporting period from 1 January to 31 December 2023 have not been prepared, in all material respects, in accordance with the applicable criteria.

Ernst & Young Ltd

 **Mathias Zeller**
(Qualified Signature)
Executive in charge

 **Martin Mattes**
(Qualified Signature)
Partner