

Report on non-financial matters 2024

In accordance with the [Swiss Code of Obligations, Article 964a-c](#)

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About the report

Since 2021, Comet has annually published a sustainability report in accordance with the GRI Standards, a practice that continues with the current report. The report presented here for the year 2024 also fulfills the requirements for the non-financial report as mandated by [Article 964a et seq. of the Swiss Code of Obligations](#) (CO) for the 2024 fiscal year and incorporates the recommendations of the [Task Force on Climate-related Financial Disclosures](#) (TCFD), which are part of Swiss national legislation to improve corporate transparency in climate-related disclosures.

Sections relevant to [Article 964a et seq. of the Swiss Code of Obligations](#) (CO) are [referenced in an index](#) at the end of this report. Reporting on climate, social and employee matters, human rights, and anti-corruption has been seamlessly integrated into the GRI-based report and supplemented with comprehensive details on risks, strategies, and performance metrics. Additionally, a summary of Comet's business model and value chain is provided in a separate section.

Purpose and business model

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

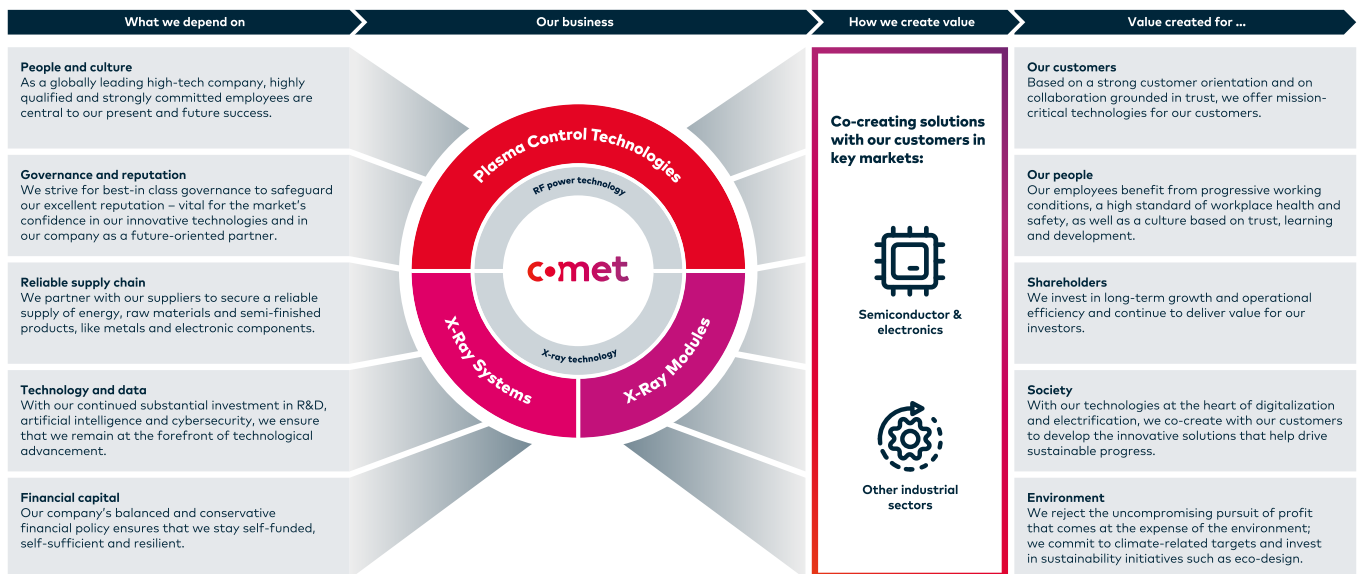
As a trailblazing, leading tech company in radio frequency power and x-ray technology, we want to make a growing contribution to a safer, more efficient, and sustainable world of manufacturing, communication, and mobility – **innovating for sustainable progress.**

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

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.

Along our value chain, we rely on numerous resources 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.

Our business model



Business description – Comet's positioning in the value chain with innovative products and services

Focus on two technologies

Since our strategic refocusing in 2019, we concentrate on our traditional technology areas of plasma control and x-ray, as well as on expanding our 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.

Significant investments in long-term and sustainable growth

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. 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.

Core markets with long-term structural growth

We target the core markets of semiconductors and electronics, both demonstrating long-term structural growth. These two markets are and will remain central for us – despite their 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 and electronics market in the coming years.

Diversified positioning to leverage current and future trends

The Plasma Control Technology (PCT) division is fully exposed to the semiconductor market, while the X-Ray Systems (IXS) and X-Ray Modules (IXM) divisions also serve a range of other industrial end markets – including automotive, aerospace, and security – by providing non-destructive testing solutions for materials and components. The semiconductor and electronics market holds significant potential for all three divisions, while the traditional industries present attractive opportunities, especially in innovative areas like battery testing for electric vehicles. Our diversified market focus positions us well to leverage current and future trends. By anticipating customer needs and investing proactively, we help customers succeed with our cutting-edge technologies.

Shared resources and operational synergies link three divisions

We conduct our business through three distinct divisions, all operating under a unified corporate structure. This strategic approach allows each division to remain flexible and agile while leveraging the benefits of a cohesive strategic framework, shared resources, and operational synergies. Our targeted product portfolio is delivered through these divisions.

The [Plasma Control Technology \(PCT\)](#) division specializes in radio-frequency technology across three product lines:

- Impedance matching networks (“matchboxes”): Solutions for precise control of plasma applications
- RF (radio frequency) generators: Providing the required energy for plasma processes
- Vacuum capacitors: Core components for RF power management

The two x-ray divisions [X-Ray Systems \(IXS\)](#) and [X-Ray Modules \(IXM\)](#) offer:

- X-ray systems: Non-destructive inspection, analysis, and quality control
- Stationary and portable x-ray modules: Non-destructive inspection of materials
- X-ray tubes: Essential components for x-ray systems
- High-voltage generators: Supplying power for x-ray equipment
- Software solutions: For visualization and analysis of x-ray data

Sensible location choice for global customer proximity

As a globally active company with Swiss roots, we generate more than 99% of our 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 through strategic site selection. The choice of location also significantly influences the selection of our suppliers and the design of efficient supply chains. In view of

the trend toward regionalization in semiconductor manufacturing, we must be able to adapt our production network quickly and flexibly.

Smart solutions to support customers' environmental engagement

The semiconductor industry and its suppliers, including Comet, face various challenges in connection with climate change. The production of semiconductors consumes significant amounts of electricity, water, and process gases, contributing to a substantial CO₂ footprint. Traditional industries such as automotive, aerospace, or security also require solutions to reduce climate-damaging emissions. Through sustainable investments and strategic innovation, we aim to help these industries meet environmental challenges while continuing to create value for stakeholders.

Strategic sustainability framework

At Comet, we prioritize sustainability across all operations, recognizing our continuous corporate responsibility toward employees, the environment, the economy, and society. This commitment drives us to uphold the highest standards in all areas of our work.

Sustainability priorities

- Reduce greenhouse gas emissions to combat climate change and promote clean energy access.
- Integrate sustainability throughout the value chain, from procurement to production, processing, sales, and distribution.
- Balance economic, environmental, and social considerations in decision-making.
- Create positive environmental and social impacts.

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

- Develop innovative, sustainable products to support customers' strategies.
- Minimize environmental impact throughout the value chain.
- Build fair, transparent relationships with suppliers and partners that reflect our values.
- Lead in sustainable development within our industry.

A more detailed description of our approach to addressing environmental, social, and governance topics can be found in the sections on the individual material topics in this report.

Material topics

The materiality analysis presented below is built upon the foundational work done in the year 2021. In 2023, as part of a context analysis, the existing material topics developed in that earlier work were first examined as to whether they remained relevant considering the present

business model, and were found to remain appropriate. The topics 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 ("impact materiality"). 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 ("financial materiality").

The resulting materiality matrix was validated by the Executive Committee and approved by the Board of Directors. The identified material topics serve as the foundation for our sustainability strategy, targets, and reporting.

To ensure that the material topics are up to date, we regularly review which topics are central to the long-term, sustainable development of the company. Consequently, we integrated the topics "Materials Compliance" and "Product Quality and Compliance" into a unified "[Technical Compliance](#)" framework in 2024, embedded within our management system. This consolidation reflects the shared focus of those two topics on adhering to technical, regulatory, and industry standards throughout the product lifecycle. This combination, which reduced the number of material topics from 15 to 14, is further detailed in the section "[Technical Compliance](#)". The placement of the new "[Technical Compliance](#)" data point in the materiality matrix is based on 2023 evaluation data.



Governance and organization

Sustainability is an integral part of strategic management and corporate planning at Comet. Only by embedding sustainability in our management practices can we take a comprehensive approach to our operations. Through forward-thinking governance, as outlined in our corporate governance report, we positively influence environmental, social, and economic development. We aim to weave sustainability into all business processes, ensuring that its measurement and management are embedded within our corporate strategy and governance. Effective sustainability management requires this comprehensive integration throughout the corporate structure. For more on our commitment and approach, please refer to our [Sustainability Policy](#).



The [Board of Directors](#) oversees and approves the sustainability strategy, including climate-related issues. As part of the reporting process, the Board is also responsible for the review and approval of the annual sustainability report, including the climate transition plan and the climate reporting. It is informed quarterly about the status of strategy implementation and thus monitors the achievement of sustainability targets. The Board of Directors' committees deal with the topics that fall within their area of responsibility, such as eco-design for the Technology Committee and non-financial elements of executive compensation for the Nomination & Compensation Committee (NCC). The Board of Directors has delegated the implementation of the sustainability strategy to the Executive Committee. Climate and other ESG issues will be discussed quarterly by the Board of Directors as part of the Group's business transformation agenda. In addition, climate risks have been integrated into the discussion of business risks since the second half of 2023. Their discussion and review is on the agenda of the Board of Directors at least twice a year.

The [Executive Committee](#) is responsible for implementing the sustainability strategy and for preparing the annual sustainability reporting. The Chief Executive Officer (CEO) acts as sponsor of the sustainability program and is therefore accountable for sustainability at Comet. In executing the strategy, the Executive Committee is supported by a Sustainability Board, chaired by the Vice President of Investor Relations & Sustainability (VP of IR & Sustainability). The VP plans, organizes and monitors operational execution, coordinates cross-functional

activities, and updates the Executive Committee in regular quarterly meetings on the progress in the strategy's implementation.

Comet utilizes monetary incentives through its long-term incentive plan (LTIP), as detailed in the compensation report. These incentives are designed to drive long-term profitable growth, support sustainability initiatives, increase shareholder value, and retain key executives.

The Sustainability Board, comprising senior management representatives, meets quarterly to discuss ongoing initiatives, launch new projects, and propose targets for approval by the Executive Committee, ensuring alignment across the Comet Group. The detailed development and operational implementation of climate and other sustainability initiatives takes place in project teams made up of representatives who are responsible for the respective topic in their divisions or in the Group functions.

Sustainability strategy: the Comet way

For over 75 years, Comet has been at the forefront of developing and producing high-tech components and systems based on x-ray and radio frequency technology. Our ability to align with global trends has been key to our sustained success.

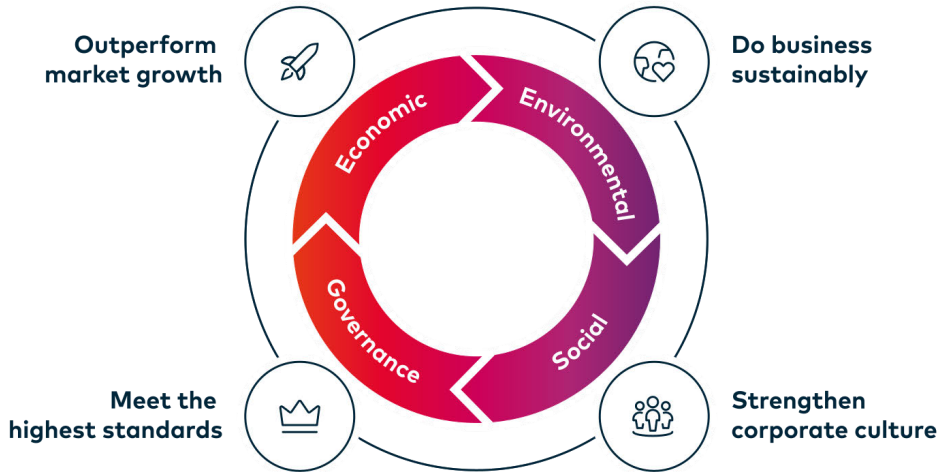
In the past years, sustainability has become another core pillar of our strategy, complementing our commitment to technological leadership. We integrate environmental, social, and governance principles into all aspects of our operations to drive long-term success and create meaningful impact.

To strengthen efforts such as reducing energy consumption, transitioning to sustainable electricity sources, promoting diversity within the organization, and implementing best governance practices, we are adopting a structured global approach. This approach aligns initiatives across regions and divisions, ensuring consistency and amplifying impact. By setting long-term goals and achieving them through incremental short-term actions, we foster continuous progress and improvement.

Our vision

Through furthering social responsibility, inclusivity, and transparent governance, we aspire to create lasting value for stakeholders while

making a positive impact on the environment, employees, and communities.



Our commitment to measurable progress

Our sustainability program aims to create value beyond financial returns, using clear and measurable criteria. In 2023, we strengthened this commitment by integrating non-financial key performance indicators (KPIs) into the [Executive Committee's long-term incentive plan \(LTIP\)](#).

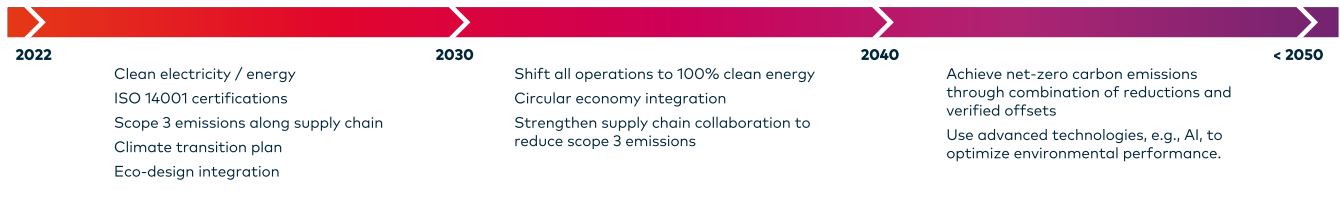
This integration highlights our dedication to advancing environmental, social, and governance outcomes. By combining a long-term vision with a phased and systematic implementation strategy, we ensure continuous improvement and sustainable growth across all dimensions of our business.

With sustainability deeply embedded in our mission, we are poised to deliver innovative solutions while meeting the evolving needs of society and contributing to a sustainable future.

Our ESG roadmap

A structured pathway to achieve our sustainability targets while creating value for all stakeholders

Environmental roadmap



Social priorities

Diversity, Equity, and Inclusion (DEI)

Define and implement diversity targets, promote employee training

Employee Health & Safety

Promote well-being by preventing risks, and ensure a safe and supportive workplace environment for employees

Community Engagement

Partner with educational institutions to promote STEM education, offer internships

Employee Development

Implement career progression programs, skills development opportunities

Social Impact in Supply Chains

Work with suppliers to eliminate risks of child labor, forced labor, and unsafe working conditions



Governance priorities

ESG Governance

Best practices for ESG governance

Transparency and Reporting

Establish clear ESG targets and KPIs aligned with leading global reporting frameworks

Compliance and Risk Management

Implement and enforce policies, integrate ESG-related risks into enterprise risk management framework

ESG in Decision-Making

Link ESG performance metrics to executive compensation to drive accountability

Stakeholder Engagement

Maintain transparent communication channels for stakeholders, align initiatives with stakeholder expectations and business priorities

Global Governance Leadership

Commit to meeting global ESG standards

In our sustainability report, we highlight our structured yet practical approach to embedding sustainability into our business strategy. While sustainability is a priority for both the Board of Directors and the Executive Committee, fostering a company-wide culture is equally crucial to engaging every employee. Achieving our sustainability goals requires all employees to embody our values and actively participate in our efforts.

We emphasize that sustainability goes beyond business advantages – it is fundamental to ensuring a livable future. To support this vision, we promote a bottom-up approach, empowering employees to share ideas and take initiative. Our commitment stems from the belief that Comet’s long-term success is built on sustainable practices, not merely on meeting regulatory requirements or external benchmarks.

Climate transition plan

Sustainability at Comet covers a broad range of priorities. While social and governance aspects are equally important to us, we are deeply committed to contributing our share to reducing emissions and, in doing so, playing an active role in the fight against climate change. We have developed a [climate transition plan in line with Swiss law](#), including targets for greenhouse gas (GHG) emissions, specifying activities to reduce emissions within our own operations and across the entire value chain, as well as considering alternative approaches for transi-

tioning to a low-carbon economy. The climate transition plan additionally addresses the mitigation of transition risks, which for many companies represent the primary climate risks, and considers seizing opportunities arising from a global climate transition. All aspects of the climate transition plan are detailed in this report. The [TCFD index](#) provides an overview of the content.

Climate roadmap and targets

The goal of reducing Switzerland's GHG emissions to net-zero by 2050 is established by the [revised CO₂ Act](#). Achieving net-zero by 2050 means that within the country, no more greenhouse gases (GHGs) are emitted than can be removed from the atmosphere within Switzerland or offset in other parts of the world. This target is a cornerstone of Swiss climate policy, aiming to limit global warming to well below 2 °C, and ideally 1.5 °C, compared to pre-industrial levels, in line with the Paris Agreement. The [Swiss CO₂ Act](#) obliges companies to support Switzerland's climate ambition by implementing the respective transition measures toward net-zero GHG emissions by 2050.

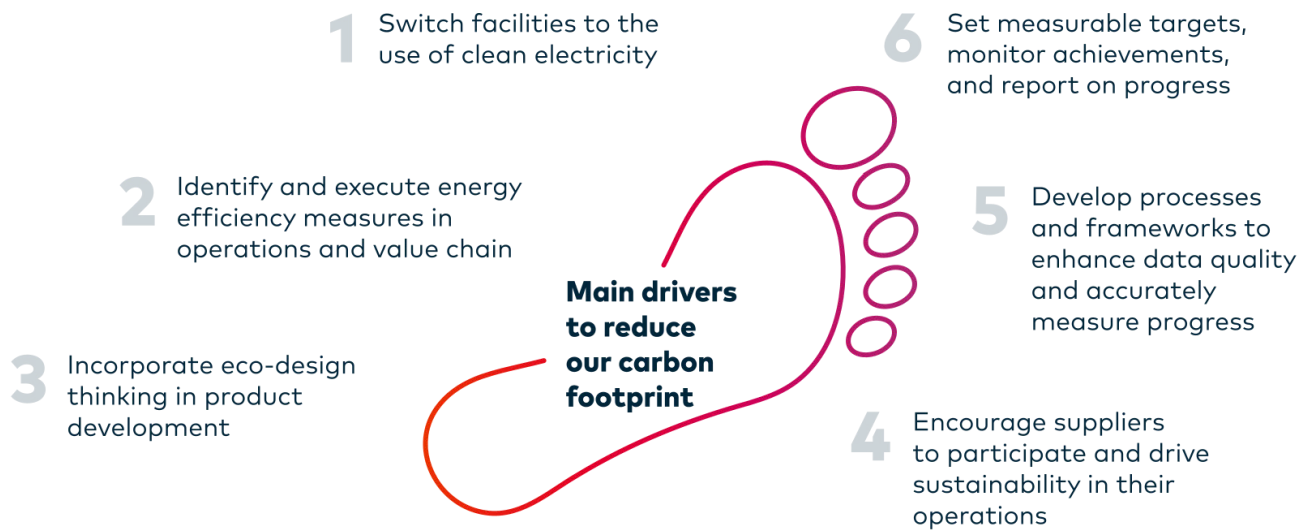
We are fully committed to aligning our global activities with Swiss climate policy as a minimum standard and contributing to mitigating climate change in accordance with the Paris Agreement. This not only entails our own long-term objective to reach net-zero emissions by 2050 but a commitment to setting SBTi near-term targets submitted at the end of 2024. This means we will set ambitious targets with a time horizon of the next 10 years. The objectives for Scope 1 and Scope 2 emissions are to align with a global warming trajectory of 1.5°C. Additionally, at least two-thirds of Scope 3 emissions are to be reduced in line with the Below-2°C target of the Paris Agreement.

The commitment to SBTi is intended to frame our existing short- and medium-term goals set out in our climate roadmap, including:

- Scope 1 emissions: Achieving Group-wide ISO 14001 certification for structured environmental target-setting at production sites
- Scope 2 emissions: Increasing clean electricity use to 80% by 2025 and 100% by 2030 (market-based method)
- Scope 3 emissions: Reducing environmental impact through eco-design initiatives embedded in R&D processes across all divisions, while collaborating with suppliers and customers to achieve a sustainable supply chain and align with net-zero commitments

Key impact mitigation concepts

To address the climate challenge, we have identified six key drivers to reduce our carbon footprint across the entire value chain and incorporated them into our structured sustainability program, focusing on:



1 We seek to achieve an effective reduction of our indirect GHG emissions from the purchase of electricity by procuring from providers using low-emission technologies. We emphasize the term "[clean electricity](#)" – our most preferred form of energy – as distinct from "[renewable electricity](#)". This focus on clean electricity ensures that our efforts are outcome-oriented and directly aligned with achieving net-zero emissions. While renewable sources such as solar, wind, and hydropower are preferred options, we recognize that relying solely on renewables is not always feasible in every context. In such cases, we also consider other clean electricity sources, including nuclear power, as viable low-carbon options that support reductions in greenhouse gas emissions.

2 Improving energy efficiency requires identifying meaningful opportunities across operations and the value chain. At Comet, we regularly assess our inventory of equipment, devices, and infrastructure to evaluate potential enhancements. These evaluations consider both environmental and economic factors, enabling us to implement viable replacements, upgrades, and renovations. By extending these efforts throughout our value chain, we aim to maximize energy efficiency, drive innovation, and create sustainable value for our stakeholders.

3 Comet's eco-design initiative, launched in 2023, focuses on enhancing the environmental performance of our products. As part of this effort, we conducted pilot projects and gathered ideas to improve energy efficiency and reduce the environmental impact of our offerings. Insights from these efforts reveal that our products offer meaningful potential for emission reductions, particularly through the sourcing and selection of raw materials for production and during the use phase at our customers, such as by optimizing standby modes. Building on these findings, we are systematically integrating eco-design principles and learnings into our R&D processes to ensure that sustainability remains an important element in future product development.

- 4 A key element of reducing Comet's climate impacts is the fostering of strong relationships with our suppliers. Although the carbon footprint of our products remains manageable due to their limited material intensity and relatively low transport volumes, we aim to take proactive steps to drive improvements. In 2025, we will launch a phased approach of first identifying areas where collaboration with our suppliers can achieve meaningful reductions in greenhouse gas emissions. Additionally, we are exploring ways to regionalize our supply chains, which would shorten transport routes and further reduce emissions. We have already achieved initial success by regionalizing the supply chain for our growing Asia hub in Penang, Malaysia. The significant reduction in shipping distances highlights how focused efforts can yield both environmental and operational advantages, serving as a blueprint for future initiatives across our global operations.
- 5 Accurate and consistent data collection, analysis, and interpretation are fundamental to understanding our environmental impacts and are the prerequisite for successfully identifying potential improvements. Through rigorous data analysis, we can identify trends, evaluate the effectiveness of current initiatives, and ensure alignment with our long-term sustainability goals. Reliable data also supports transparency and accountability, enabling us to communicate our progress to stakeholders with confidence. By embedding a systematic approach to data management in our sustainability strategy, we ensure that our efforts are not only measurable but also scalable, paving the way for continuous improvement and lasting impact.
- 6 Effective progress toward achieving net-zero GHG emissions requires ambitious objectives. We strive to update and expand our existing set of targets and to develop reliable and efficient monitoring processes. Transparent reporting of our progress is our recipe for a strong and trusted Comet brand.

Consideration of risks and opportunities

To estimate our financial exposure and vulnerability to global climate-related developments, the Sustainability Board periodically assesses, refines and validates climate-related risks and opportunities according to the principles recommended by the [Task Force on Climate-Related Financial Disclosures \(TCFD\)](#). Detailed information on our current assessment is provided in the section "[Risk management: climate-related risks and opportunities](#)". The section further outlines how we strategically approach our risks and elaborates on Comet's resilience to climate change and transition.

Risk management: climate-related risks and opportunities

We maintain a comprehensive [risk management system](#) with clear definitions and processes, covering a broad range of aspects. This includes a regular review of the risks and opportunities for each division and for the central functions, in accordance with the Enterprise Risk Management (ERM) Policy of the Group. The policy's intent is to establish the governance, methodology and process to proactively identify, assess, and mitigate the key risks to Comet and thus to ensure the resilience and success of our operations. In 2025, we will extend this exercise to all subsidiaries.

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 Extended Executive Committee. 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.

For risks that are classified as significant, we develop action plans to reduce both the probability of occurrence and the severity of potential damage. The Executive Committee regularly reviews both 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.

In particular, we systematically consider climate-related aspects, implementing the recommendations of the [Task Force on Climate-related Financial Disclosures \(TCFD\)](#) as required by Swiss law. Climate-related risks and opportunities and their impacts on our business model are re-evaluated on an annual basis and validated by the Sustainability Board.

The TCFD recommendations differentiate between climate-related physical and transition risks as well as associated opportunities. Chronic physical risks arise from climate-related weather patterns, such as rising temperatures or water scarcity, while acute physical risks are event-driven, including floods and storms. Physical risks can have direct financial consequences for us, such as damage to our assets. While they typically do not provide opportunities, they necessitate protective measures and corresponding financial investments. Further, the transi-

tion to a low-carbon economy may involve shifts in policy, legislation, technology, or market dynamics. Depending on the nature, pace, and scope of these changes, transition risks can pose varying levels of financial challenges for us. Conversely, proactive climate protection measures and strategic adaptation can create climate-related opportunities, unlocking competitive advantages for businesses.

Climate-related risks

In 2024, our Sustainability Board analyzed and reassessed the existing climate risks and opportunities identified in 2023 (see Annual Report 2023) in terms of their completeness, continuing validity, and relevance to identify the significant financial aspects related to climate change. While some minor adjustments regarding the assessment of impact and probability of occurrence were made, it was confirmed that climate-related risks do not currently rank among the top risks for the company. Furthermore, any relevant opportunities are long-term in nature, and their potential financial benefits are subject to significant uncertainty. As a result, a detailed financial assessment of such risks has not been conducted, as the low probability of such events and the adequate financial coverage of potential damages from climate-related physical occurrences mitigate the immediate need for further analysis.

	Risk type			Value chain			Time horizon			Likelihood			Expected impact		
	Acute physical risk	Chronic physical risk	Transition risk	Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term	Unlikely	Likely	Very likely	Low	Medium	High
<p>Increasing disruption of the supply chain due to natural disasters</p> <p>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 globally. Our main approach to achieving more secure supply is dual sourcing, meaning that a critical good is to be simultaneously procured from two mutually independent sources.</p>															
<p>Impact of storms and other extreme weather events on Comet sites</p> <p>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.</p>															
<p>Rising costs of raw materials and intermediate goods</p> <p>Comet uses highly specific materials to manufacture its products. Due to changing ESG or climate-related regulations, including additional carbon taxes impacting global supply chains, the cost of raw materials could increase. In addition, the availability of certain raw materials could be limited due to geopolitical circumstances. However, rising costs would affect the whole market and would be reflected in pricing.</p>															
<p>Regulation of existing products and services</p> <p>Stricter climate-related 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. However, Comet is accustomed to working within strict product regulations and has already implemented an eco-design initiative for its product portfolio.</p>															
<p>Customer demands for a reduction in CO₂ emissions from products and the transition to energy from renewable sources</p> <p>The semiconductor industry, which accounts for over 70% of Comet's net sales, is resource-intensive and generates significant carbon emissions. Comet's customers are therefore striving to reduce carbon emissions in their upstream value chain. Should Comet not participate in these efforts, it could lead to a loss of business opportunities. Comet addresses this with its commitment to the Science Based Targets initiative (SBTi) and its eco-design initiative.</p>															
<p>Reputation risk: Public demand for continuous review of climate risks and publication of the results of the analyses</p> <p>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 by leading to the loss of business opportunities. Comet addresses this risk with its climate transition plan.</p>															

We recognize the importance of energy management and are pursuing a strategy to strengthen our resilience in the energy procurement market. This strategy includes transitioning to the exclusive use of local and, wherever possible, renewable energy sources. If renewable sources are unavailable, we use clean-energy alternatives or compensate for greenhouse gas emissions through certificates of origin. We have already begun the changeover to renewable or clean electricity in recent years and plan to intensify these efforts soon. This strategic orienta-

tion 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, USA, have switched completely to renewable or clean electricity. In 2024, we implemented guidelines for electricity procurement into the Group Purchasing Policy for Indirect Materials, Services and Equipment to harmonize and standardize the procurement of renewable or clean electricity at all sites.

In 2023, we launched an [eco-design initiative](#), which includes an action plan, training, and life cycle assessments to better understand the CO₂ footprint of our products. The aim is to continuously optimize the product portfolio while taking sustainability aspects into account, including investment in research and development. The details on the progress achieved in 2024 are presented in the section "[Energy management and carbon emissions](#)".

Climate-related opportunities

The successful adaptation to climate change and implementation of mitigation measures can also open up opportunities for Comet and positively impact our competitive ability. In addition to the risks, Comet's Sustainability Board has also revalidated two climate-related opportunities that could potentially have a significant financial or strategic impact on the company:

	Value chain			Time horizon			Likelihood			Expected impact		
	Upstream	Own operations	Downstream	Short-term	Medium-term	Long-term	Unlikely	Likely	Very likely	Low	Medium	High
<p>Increased demand for products and services</p> <p>The digitalization and electrification of the economy and society present significant opportunities for Comet in the areas of non-destructive testing (NDT) and quality assurance (QA). As those two secular trends drive advancements in semiconductors, batteries, and innovative materials, the need to ensure the reliability, safety, and performance of these critical components is ever-growing.</p>	○ — ○ ●			○ — ○ ● ○			○ — ● — ○			○ — ● — ○		
<p>Electrification</p> <p>The electrification of the automotive industry and other industrial sectors means a significant growth opportunity for wafer fabrication equipment manufacturers. As industries shift toward electrification, the demand for advanced semiconductors and microelectronics is surging, driven by their critical role in enabling the technologies that power electric vehicles (EVs), renewable energy systems, smart grids, and industrial automation.</p>	○ — ○ ●			○ — ○ ● ○			○ — ● — ○			○ — ● — ○		

The global trends of electrification and digitalization are revolutionizing industries, driving the demand for ever more advanced, efficient, and reliable semiconductor chips. Applications like autonomous driving or smart grids demand exceptional reliability, as even a single chip defect can lead to severe consequences in safety-critical and mission-critical scenarios. The increasing complexity and miniaturization of chips elevate the risk of manufacturing defects, making comprehensive quality assurance essential to meet stringent reliability standards.

Outsourced Semiconductor Assembly and Test (OSAT) providers play a vital role in addressing these challenges. Their expertise in advanced packaging and rigorous testing ensures chips perform optimally while improving energy efficiency and reducing size. Projections indicate the OSAT market is poised to grow at a robust rate of around 8% over the next two to five years. In response to this growth, we are collaborating with a leading OSAT provider to develop innovative solutions that integrate energy-efficient monitoring into microchip packaging processes. While this project involves no financial risks, it offers significant opportunities to establish us as a product and technology leader in this rapidly expanding market.

Beyond semiconductors, opportunities are emerging in our traditional markets, such as automotive, aerospace, and security industries. By employing 100% x-ray inspection, the quality of manufactured parts can reach levels that enable a reduction in standard safety allowances during design. This optimization decreases material usage and energy consumption, contributing to more sustainable manufacturing practices while maintaining the highest safety standards.

Through these efforts, we continue to advance sustainability while driving innovation and strengthening our position across key industries.

Business resilience

To better understand the future consequences of evaluated risks and opportunities for our business model, we qualitatively considered climate scenarios to project our resilience to climate change-related developments. Climate scenarios offer hypothetical views of future conditions including variables such as greenhouse gas emissions, socio-economic development, technological advances, and policies. When implementing [TCFD recommendations](#), we consider two scenarios:

- A "sustainability" scenario forecasts rapid and collaborative global climate transition in alignment with the goals of the Paris Agreement and is thus deemed to represent the most challenging conditions for a successful climate transition by Comet.
- In a "hot-house" scenario, socio-economic developments such as regional rivalry jeopardize a timely transition to a climate-friendly economy, resulting in global warming of up to 4°C toward the end of the century. In such a scenario, physical risks are expected to be most significant, as environmental conditions would likely be changed the most.

Based on our climate risk assessment, we believe that we are neither strongly exposed and vulnerable to transition risks in a sustainability scenario, nor to physical risks in a hot-house scenario. We thus believe that we have considerable resilience to developments in regulation, markets, and technology, as well as to intensifying environmental hazards.

Environmental topics

At Comet, we recognize that environmental stewardship is essential to the long-term success of our business, the well-being of our communities, and the health of our planet. Guided by a commitment to sustainability, we strive to minimize our environmental impact through responsible resource management, innovative solutions, and the integration of environmentally sound practices across our operations.

Our approach is rooted in aligning our activities with global environmental goals, including reducing greenhouse gas emissions, enhancing energy efficiency, and promoting circularity in our materials and processes. We actively engage with stakeholders to foster collaboration and innovation in addressing pressing environmental challenges.

As we continue our journey toward a more sustainable future, we remain focused on embedding environmental responsibility into every aspect of our business. This section highlights the progress we have made, the challenges we face, and the actions we are taking to ensure that Comet contributes meaningfully to a world that is good to live in.

Environmental management system and compliance

Sustainability is a core element of our corporate culture. We aim to deliver high-quality products and services while minimizing environmental risks and conserving resources. Our corporate standards are detailed in the Comet Group's Quality, Environmental, and Safety Policy, supported by the [Code of Conduct](#). As part of our commitment to responsible business practices, we systematically assess and manage risks related to regulatory compliance, operational efficiency, and sustainability. By identifying and addressing these risks, we ensure alignment with legal requirements, stakeholder expectations, and long-term business resilience.

A key aspect of our approach is compliance with both Swiss regulations and the evolving European Union regulatory landscape. Potential risks include fines and penalties for non-compliance, which we mitigate through proactive monitoring, internal controls, and continuous employee training.

Beyond legal consequences, we recognize that non-compliance and insufficient sustainability measures can impact our brand reputation. As consumer expectations and regulatory frameworks evolve, we actively engage with stakeholders and industry initiatives to maintain trust and transparency.

Further regulatory developments could affect our products and services, particularly concerning energy efficiency, producer responsibility, electronic waste, and trade regulations. To stay ahead, we incorporate regulatory foresight into our product design and supply chain decisions, ensuring compliance and competitive advantage.

Additionally, increasing operational costs due to regulatory carbon pricing present a financial risk. We address this by investing in energy efficiency, transitioning to clean energy sources, and continuously optimizing our processes to reduce carbon emissions.

Aligning ISO 14001 certification project with ESG strategy

The ISO 14001 implementation is a global initiative encompassing Comet's seven major manufacturing sites. By the end of the second quarter of 2025, selected manufacturing sites will be fully prepared to begin measuring and improving environmental performance. The first four sites are scheduled for ISO 14001 audits in 2026, with the remaining three sites to follow in the 2027 and 2028 audit cycles. We specifically aim to establish site-level bottom-up targets that will be consolidated at the Group level, serving as operational goals focused on reducing Scope 1 emissions and targeted Scope 3 emissions, particularly those related to manufacturing processes and logistics, as well as targets for water consumption and waste reduction.

In light of the upcoming implementation and certification of our environmental management system in accordance with ISO 14001, we are strengthening our commitment to resource conservation, waste reduction, and sustainable product life cycles. The implementation of ISO 14001 is closely aligned with our ESG program. Together and in a coordinated manner, these two initiatives will reduce our environmental footprint and the use of finite resources.

When implementing ISO 14001, processes must be designed to ensure more efficient use of raw materials and to minimize production waste. Key measures include recovery mechanisms for valuable materials. The reintegration of products will be a central component of our ISO 14001 program. We are evaluating take-back, reuse, and recycling programs to recover valuable materials from end-of-life products and reduce resource depletion caused by disposal.

Disclosures in accordance with GRI 303-5 and 306-3

Resource efficiency metrics¹

		2024	2023
Waste (total)	t	1,751	2,120
Non-hazardous waste (total)	t	1,664	2,006
– Incineration	t	148	148
– Landfill	t	1,078	998
– Recycling	t	439	859
Hazardous waste (total)	t	87	114
– Incineration	t	0	2
– Landfill	t	3	0
– Recycling	t	84	112
Water consumption	m³	31,248	24,411

¹ Scope covers all of Comet's companies and locations

The decrease in waste figures for 2024 reflects our ongoing efforts to reduce waste. Specific measures include reducing packaging materials for transportation, which not only cuts waste but also improves efficiency.

In contrast, water consumption increased compared to the previous year. This can be attributed to several factors: higher production volumes led to an overall rise in water usage, and an increased number of employees also contributed to the higher consumption. Additionally, there were one-time events that impacted water usage, such as the centralization of water treatment systems and a disruption in the reverse osmosis system in Flamatt, Switzerland, that required increased water use to restore its functionality.

Energy management and carbon emissions

Energy use and greenhouse gas emissions across the value chain

We are actively working to use energy more efficiently and reduce greenhouse gas emissions in our own processes and throughout the value chain. By increasing the use of renewable, clean and low-emission technologies, as well as optimizing operational processes, we strive to minimize our environmental impact and contribute to combating climate change.

Our operations involve energy consumption, primarily in the form of electricity. A stable and reliable power supply is therefore a necessity. To safeguard against potential disruptions, we have implemented comprehensive measures to ensure that our electricity procurement remains secure, even in emergency situations.

Our procurement teams engage in proactive and forward-looking planning to mitigate risks related to energy supply. This includes establishing diversified energy sourcing strategies, securing backup power solu-

tions, and developing contingency plans in close collaboration with trusted energy providers. These precautionary steps enable us to maintain operational continuity and protect our production capabilities under unforeseen circumstances.

Monitoring and reducing Scope 1 and Scope 2 emissions are key elements of our strategy for achieving short- and medium-term emissions targets set. For us, these emissions mainly consist of indirect greenhouse gas emissions that arise from the consumption of purchased electricity. In the reporting year, we consumed roughly 21,000 megawatt hours (MWh) of energy. We sourced 85% of this energy in the form of electricity. The remaining 15% was obtained from fuels such as natural gas and diesel. Accordingly, we are initially focusing on transitioning our electricity supply to clean sources to reduce emissions. As a limiting factor to those efforts, we lease the premises at all our locations except for the Flamatt site, which is owned by the company. This complicates emission management to the extent that the availability of renewable or clean electricity at some sites is nil or limited.

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

Environmental metrics¹

		2024 ²	2023 ³
Energy consumption (total)⁴	MWh	21,084	19,995
Electricity (total)	MWh	17,922	16,997
of which clean electricity	MWh	11,959	11,502
Heating (total)	MWh	2,098	1,984
Heating oil	MWh	81	141
Natural gas	MWh	1,761	1,587
District heating	MWh	256	256
Fuels (diesel, petrol, LPG) (total)	MWh	1,064	1,014
Greenhouse gas emissions (total)³	tCO₂e	5,630	5,092
Greenhouse gas emissions (total)			
Scope 1 (total)⁵	tCO₂e	662	631
Heating	tCO ₂ e	382	363
Fuels (diesel, petrol, LPG)	tCO ₂ e	280	268
Scope 2 (total)	tCO₂e	4,968	4,461
Electricity ⁶	tCO ₂ e	4,924	4,417
District heating	tCO ₂ e	44	44

¹ Scope covers all of Comet's companies and locations

² Figures for 2024 were externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

³ For an explanation of significant deviations from the figures published in the 2023 Annual Report and of the restatements performed, see the section "Basis of calculations and definitions" (Restatements)

⁴ Steam and district cooling is not procured by Comet and is therefore not included in the data presented

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

⁶ Greenhouse gas emissions were calculated in accordance with the market-based approach of the Greenhouse Gas Protocol. Locations with a certificate of origin were calculated using the relative emission factors; other locations were calculated using the residual country mix. Considering only the location-based approach resulted in 5,056 tonnes of CO₂e emissions for Scope 2 in 2024.

According to the GHG Protocol, only CO₂ is relevant for Comet, as emissions of the other six greenhouse gases are negligible in this context. In addition, any residual emissions from these gases are already accounted for in the emission factors of the respective energy sources, as these factors are reported in CO₂ equivalents.

During the reporting year, a comprehensive environmental data collection system was implemented through a cloud-based software solution, allowing ESG managers worldwide to input data on a monthly basis. Additionally, as part of the system's rollout, the methodology for calculating the proportion of clean electricity sourced was refined, leading to a share of clean electricity of 67% compared to 68% in the previous year. The reason for this slight decrease was the production growth in 2024, as described in the next section. For a comprehensive explanation of definitions and methodologies used, refer to the section titled "Basis of calculations and definitions".

In the fiscal year under review, Comet experienced an increase in energy consumption, primarily in electricity usage. This rise was entirely driven by higher production volumes resulting from a recovery in the semiconductor cycle, which led to a 12.1% increase in revenue. Consequently, Scope 2 emissions also increased, as a significant portion of this growth occurred at our Penang, Malaysia plant, which relies on only a low fraction of clean electric power sources. In 2024, the impact of higher production volumes was partially offset by transitioning our operations in Aachen, Germany, and Copenhagen, Denmark, to renewable electricity contracts. Additionally, to compensate for emissions at the Penang site, Comet is in the process of acquiring Renewable Energy Certificates (RECs). In contrast to the increase in Scope 2 emissions, Scope 1 emissions remained stable compared to the previous year.

Although absolute energy consumption increased, energy intensity – measured as total energy consumption per million CHF in revenue – decreased from 50.3 MWh to 47.3 MWh. This reduction was partly due to the transition of additional facilities to renewable electricity as described above during the reporting year, as well as a series of smaller measures, such as switching to energy-saving lighting and installing motion sensors at various sites. These efforts are being continuously implemented.

While Scope 1 emissions (direct emissions from company-owned or -controlled sources) and Scope 2 emissions (indirect emissions from the generation of purchased electricity) are important levers for reducing greenhouse gas (GHG) emissions in the near term, the majority of our total emissions are Scope 3 emissions, which encompass all other indirect emissions along the value chain. Having initially focused on under-

standing and managing our Scope 1 and Scope 2 emissions as a foundational step in reducing our overall carbon footprint, we are now shifting our attention toward addressing Scope 3 emissions. This allows us to tackle the most significant portion of our emissions and work collaboratively with suppliers, customers, and partners to drive meaningful, long-term impact throughout the entire value chain.

In the reporting year, we continued to refine our approach for screening Scope 3 emissions. Upstream and downstream activities – including raw material production, transportation, and product use by customers – constitute the majority of our carbon footprint, with Scope 3 emissions accounting for roughly 93% of total CO₂ emissions in 2024. Our improved process revealed Scope 3 emissions at approximately 113,000 metric tons reported to [CDP](#) in 2024. The Scope 3 emissions screening conducted in 2024 showed that approximately 80% of the Scope 3 emissions are attributable to Category 1 (Purchased goods and services) and Category 11 (Use of sold products). Based on the Scope 3 screening, Category 2 (Capital goods), Category 4 (Upstream transportation and distribution), Category 6 (Business travel), Category 7 (Employee commuting), and Category 9 (Downstream transportation and distribution) were also identified as relevant emission sources, accounting for the rest of the emissions. All other Scope 3 categories were assessed as not material during the screening process.

Systematic implementation and risk management

The findings of the Scope 3 emission screening have determined our priorities for 2025 and beyond. Through the frameworks of [TCFD](#) and [SBTi](#), we will analyze climate-related risks such as physical damage, production disruptions, and regulatory changes.

As part of our commitment to climate responsibility, we are developing a structured emission reduction pathway aimed at systematically lowering greenhouse gas (GHG) emissions across our operations and value chain. This pathway prioritizes reductions in Scope 1 and Scope 2 emissions through increased energy efficiency and the transition to clean energy, while also addressing key Scope 3 emission sources in collaboration with suppliers and partners.

Product impact

Our products have a significant impact on both society and the environment. At a societal level, our technologies are critical in the production of semiconductor chips and sensors – core components that power the digital world. From an environmental perspective, our impact spans the entire product life cycle, beginning with the sourcing of raw materials, continuing through product use, and extending to end-of-life disposal.

Our products have environmental impacts due to resource extraction, energy consumption, and waste generation at the end of their life cy-

cle. They rely on rare and heavy metals like tungsten, neodymium, and lead, which can contribute to habitat pollution. Their operation consumes electricity, thus increasing carbon emissions, particularly in fossil fuel-dependent regions. Manufacturing requires water and generates waste, while disposal remains challenging due to complex material recovery and limited recycling programs. To address these impacts, in addition to our ISO 14001 initiative and the use of clean electricity, we are actively exploring ways to minimize our environmental footprint through our eco-design initiative. This includes developing energy-efficient designs, promoting sustainable manufacturing, and implementing take-back programs for rare material recycling. Exploring alternative materials and extending product life cycles further support waste reduction.

Evaluating and reducing our environmental footprint is increasingly important for us. This focus is driven by growing customer demand for environmentally responsible products and our own commitment to prioritizing sustainability when selecting suppliers. By integrating sustainability more deeply into our supply chain, we aim to further reduce our overall environmental impact.

Eco-design trainings and implementation progress

In the reporting year, we conducted a series of eco-design training sessions (8 modules) with approximately 300 selected employees from R&D, sales, marketing, and other relevant internal stakeholders across the entire group. Pilot projects have been completed in two of the three divisions, with further progress underway in the remaining division. These initiatives, conducted using the full life-cycle approach and established life cycle assessment (LCA practices (ISO 14040/44), focused on identifying ideas for every stage of the product lifecycle to reduce the product's environmental footprint. As is typical in our industry, the primary focus has been on emissions related to material sourcing and product usage by customers, which are the most emission-intensive categories (Scope 3 categories 1 and 11). Improvement proposals have been developed for these two areas. The next step involves implementing the insights gained, which range from optimizing standby modes and reusing components to sourcing alternative materials. Additionally, eco-design principles are being integrated into the development processes within the R&D departments, involving both Comet's Chief Technology Officer and the Global R&D Heads of the three divisions.

While the eco-design process has not yet been fully implemented, it was discovered during the pilot projects that in the development of a new generator within the X-Ray Modules division (IXM), the product's carbon footprint was reduced by nearly 50% from one generation to the next solely through the use of alternative materials. With the launch of several new products in the past fiscal year, it can therefore be assumed that simply by virtue of technological progress, the introduction of these products featuring state-of-the-art and more energy-

efficient components has led to significant improvements in the carbon footprint of new systems and components.

Failing to properly assess the environmental and safety impacts of our products could expose us to significant risks. Products that cause harm or fail to meet legal safety standards could lead to product liability claims, resulting in costly legal disputes that divert valuable resources and time. Additionally, financial penalties, damages, and product recalls could impose severe financial burdens on the company. To mitigate these risks, it is essential to conduct thorough assessments and ongoing monitoring of our products' impacts. This approach helps protect our customers' trust and safeguard Comet's long-term integrity.

Social topics

Our employees are united by a passion for technology, a strong corporate culture, and a commitment to our shared values. This is the basis for our success.

As employees of Comet, we are aware of our responsibility in a world with more and more people and limited resources. Qualified and committed employees are a key prerequisite for our past and future success. That is why we invest in a corporate culture based on customer orientation, challenge and empower, and trustful collaboration in everything we do.

Through our continuous efforts, we create value for our employees, our customers, and our stakeholders worldwide. Our employees benefit from progressive working conditions, a well-managed health and safety program and a culture based on trust. This creates the basis for above-average performance and thus a high level of customer satisfaction and loyalty, in many cases for years to come. Finally, we take our social responsibility seriously by supporting community projects and private-sector initiatives.

Employer attractiveness

We recognize the critical importance of being an attractive employer in a rapidly evolving labor market environment. By creating a flexible, inclusive, and appealing workplace culture, we aim to attract and retain talented employees who contribute to innovation and productivity. Employer branding, talent development, and a strong corporate culture are central to the company's strategy. Ensuring employee well-being

and loyalty remains a top priority, reflected in initiatives that support engagement, career development, and transitions beyond working life.

Responsibilities for fostering an attractive and supportive workplace at Comet are clearly defined across different levels of the organization. The Human Resources team under the lead of the Chief Human Resources Officer (CHRO) plays a central role by implementing policies to support recruitment, employee engagement, and smooth transitions, such as retirement. Management ensures that the corporate culture aligns with Comet's values and strategic objectives, creating a cohesive framework for success. Leadership teams oversee key initiatives, including training programs, employee engagement efforts, and monitoring satisfaction to drive continuous improvement. At the team level, supervisors facilitate participation in these initiatives and implement measures to secure workplace satisfaction, ensuring alignment with overall company goals.

Enhancing employer attractiveness in 2024

Introduction of new job grading

At Comet, we prioritize fairness and equal opportunity through our structured job grading system. By evaluating roles based on complexity, responsibility, and required skills across all job profiles and countries, we ensure equitable compensation and clear career growth paths. This approach supports employee development and strengthens our position as an attractive, inclusive employer.

Employee voice survey

Late in 2024, eighty-two percent of our global workforce participated in the employee voice survey, with three countries achieving 100% participation. The results were analyzed, and key findings will be shared with employees in early 2025. This helps us to identify top areas of focus for improving business performance and reinforces our commitment to be an employer of choice.

Internships

At Comet, internships are more than early career steps – they are a dynamic exchange where everyone benefits. Last year, we proudly hosted internships at various levels, providing interns with hands-on experience while mentors expanded their skills and gained fresh perspectives. This continuous mutual learning and curiosity drives our ongoing growth and success.

Collaboration with academia

We maintain several partnerships with globally leading academic institutions, providing direct collaboration with researchers and access to the latest research. These partnerships also connect us to a strong pool of emerging talent.

Training and development

At Comet, we recognize that continuous learning is essential for employee growth and organizational success. We offer regular training in quality, health and safety, compliance, and leadership to empower our teams. Our online training platform provides a wide range of courses, ensuring employees have the tools to grow and succeed. This includes, for example, training sessions in our Semiconductor Academy, as well as those related to the use of AI and data protection.

Education

We are deeply committed to supporting education and career development through diverse initiatives. Among many other engagements, this includes, for example, sponsoring and participating in a six-hour race with hydrogen-powered model cars built by apprentices, engaging in BAM 2024, Switzerland's largest vocational education fair. Additionally, participation in the SEMI Career Fair at the University of Swansea and the Penang Tech, Engineering & Semicon Career Fair 2024 in Malaysia further expanded Comet's global talent outreach.

We support employees beyond their tenure. The Human Resources team assists with transitions, including retirement and other departures, ensuring employees feel valued and supported throughout their journey with the company.

We continuously monitor employee satisfaction and engagement through regular employee surveys and market benchmarking, providing us a clear understanding of workforce sentiment. Policies and regulations are evaluated on an ongoing basis to ensure they align with employee needs and support organizational objectives. Additionally, the company tracks participation in mandatory training courses and periodic refreshers to maintain high standards in areas such as safety, compliance, and professional development.

Our comprehensive approach to attracting, retaining, and developing talent ensures a resilient, motivated workforce capable of driving our long-term success.

Disclosures in accordance with GRI 2-7

Composition of the workforce¹

	Male			Female		
	2024 ³	2023	±	2024 ³	2023	±
Workforce by employment contract						
Permanent	1,228	1,146	7.2%	407	373	9.1%
Temporary	46	42	9.5%	22	17	29.4%
Workforce by employment type ²						
Full-time	1,182	1,104	7.1%	385	356	8.1%
Part-time	1,062	1,006	5.6%	312	288	8.3%
Workforce by age group ²						
<30	120	98	22.4%	73	68	7.4%
30-50	1,182	1,104	7.1%	385	356	8.1%
>50	148	117	26.5%	52	33	57.6%
	643	603	6.6%	234	215	8.8%
	391	384	1.8%	99	108	-8.3%

¹ For definitions of the categories see the section "Basis of calculations and definitions"

² Permanent staff only

³ Figures for 2024 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	
	2024	2023	2024	2023	2024	2023
Total	1,039	968	343	314	253	237
Permanent	978	920	337	311	252	229
Temporary	61	48	6	3	1	8

Workforce by employment type¹

	Europe		Asia		North America	
	2024	2023	2024	2023	2024	2023
Total	978	920	337	311	252	229
Full-time	785	754	337	311	252	229
Part-time	193	166	0	0	0	0

Workforce by category¹

	Male			Female		
	2024	2023	±	2024	2023	±
Total	1,182	1,104	7.1%	385	356	8.1%
Production-related	603	587	2.7%	151	146	3.4%
Marketing and sales	168	155	8.4%	76	76	0.0%
General and administration	116	95	22.1%	121	100	21.0%
Research and development	295	267	10.5%	37	34	8.8%

¹ Permanent staff only

In the reporting year, we expanded our workforce at all levels to successfully navigate the semiconductor industry's upswing and implement our growth strategy. This expansion took place across all regions, including both permanent and temporary employees, while also strengthening our R&D capabilities.

Disclosures in accordance with GRI 401-1

Rate of employee turnover¹

		2024 ²	Rate	2023 ³	Rate
Age group	<30	31	16.4%	62	29.5%
	30-50	93	11.0%	128	15.4%
	>50	43	9.2%	103	21.7%
Gender	Male	114	10.1%	216	18.7%
	Female	53	14.5%	77	21.2%
Region	Europe	104	10.9%	106	11.5%
	Asia	38	12.1%	95	28.1%
	North America	25	10.8%	92	35.4%
Turnover		167	11.1%	293	19.3%

¹ Permanent staff only

² Figures for 2024 were externally audited by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards

³ Figures for 2023 were adjusted to reflect the fact that calculations only relate to permanent staff

New employee hires¹

		2024	Rate	2023	Rate
Age group	<30	66	35.0%	27	13.0%
	30-50	143	9.6%	112	8.5%
	>50	45	16.9%	40	13.5%
Gender	Male	171	15.1%	52	14.4%
	Female	83	22.6%	127	11.1%
Region	Europe	148	15.6%	119	10.9%
	Asia	64	20.1%	36	12.9%
	North America	42	18.0%	24	9.5%
New entries		254	16.9%	179	11.9%

¹ Permanent staff only

Additionally, employee turnover rates declined, while the number of new hires increased, reflecting a more stable business environment and the positive momentum within our end markets, mainly in the semiconductor industry.

Employee health and safety

At Comet, protecting the health and safety of our employees is fundamental to both their well-being and the company's success. Operating in the high-tech semiconductor value chain, we depend on highly skilled specialists in production, sales, product management, and R&D. We do our utmost 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. As well, illness and accidents pose significant operational challenges, as replacing these experts on short notice is difficult. Therefore, reducing downtime and promoting knowledge-sharing are key aspects of our strategy to safeguard the company's success.

Ensuring the health and safety of employees and service providers is a top priority in our operations. Our Quality, Environmental, and Health & Safety Policy provides the foundation for occupational safety, applying globally to all employees, including external and temporary workers. Our management system enforces compliance with health and safety standards across all sites, ensuring that workplace safety is actively practiced, documented, and continuously improved.

Health and safety measures are tailored to the size of each unit and its specific risks. Compliance with local laws and regulations is mandatory, such as Germany's Occupational Health and Safety Act ("Arbeitsschutzgesetz"), the German Social Accident Insurance system ("Deutsche Gesetzliche Unfallversicherung"), and, in Switzerland, the ten points of the Federal Coordination Commission for Occupational Safety ("Eidgenössische Koordinationskommission für Arbeitssicherheit", or EKAS). Country general managers ensure adherence to regulations, while division country managers oversee implementation.

Leadership at all levels plays a crucial role in enforcing preventive measures and fostering a strong safety culture. We monitor health and safety objectives through continuous process tracking, regular effectiveness reviews, and annual audits based on location and risk exposure. Policies and guidelines are regularly reviewed and updated to align with current regulations and evolving industry standards, ensuring an effective and proactive health and safety management system.

The well-being of employees and customers is important to our management. The company's organizational units 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.

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 underappreciated number-one 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.

By embedding proactive health and safety management into our operations, we not only fulfill our ethical obligations but also ensure operational resilience, enabling long-term economic success in a dynamic and demanding industry.

Key elements of Comet's comprehensive health & safety culture

- Preventive measures: Regular training and development address health and safety topics; examples in 2024 were ergonomics in the home office, responsibility in occupational safety (workshop for individuals in leadership roles), and stress management for greater calmness in everyday work.
- Workplace safety initiatives: Preventive measures for specific hazards, such as laser use, chemicals, and ionizing radiation, are enforced to protect employees.
- Information sharing: Health tips and safety reminders on topics like sports injuries and household accidents are regularly shared via the social intranet.
- Incident reporting: Any deficiencies or violations are reported and addressed immediately to prevent recurrence and drive continuous improvement.

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

Disclosures in accordance with GRI 403-9 and GRI 403-10

Occupational health and safety metrics

	2024	2023	±
Injuries ¹	23	24	- 4.2%
Lost workdays due to work-related injuries	19	9	111.1%
Lost workdays due to illness	11,072	12,703	- 12.8%

¹ Injury occurring as a result of or during the course of work. The definition of injury follows local labor law where applicable; otherwise, it is determined by internal organizational provisions. Only recordable injuries are included.

In 2024, workplace injuries saw a slight decrease, reflecting our continued commitment to safety and risk prevention. While lost working days increased, they did so from a very low baseline, underscoring the effectiveness of our measures in mitigating incidents. Notably, the number

of working days lost due to illness declined, with significant improvements observed in Switzerland and China.

Responsible supplier standards

We are dedicated to maintaining a supply chain that aligns with product performance standards and adheres to ethical and sustainable practices. A cornerstone of this commitment is our [Supplier Code of Conduct \(Supplier CoC\)](#) based on the [Responsible Business Alliance \(RBA\) Code of Conduct](#). The Supplier CoC includes, among other topics, compliance with the law, the prohibition of corruption and bribery, respect for workers' fundamental human rights, and the prohibition of child labor. The Supplier CoC was revised and implemented in the reporting year.

Suppliers agree to uphold the principles of the [Supplier CoC](#) by signing the document, which is periodically updated to reflect changes in compliance policies. Suppliers are also obligated to notify us of any known or suspected violations.

The purchasing department is responsible for the evaluation of new suppliers and assesses the performance of existing suppliers to ensure alignment with our ethical and sustainability standards, as described in the Comet Quality Management System (CQMS). Supplier compliance is verified through audits, on-site inspections, and document reviews, conducted by Comet, its subsidiaries, or designated agents. Monitoring efforts focus on minimizing risks, safeguarding our reputation, and upholding social and environmental principles.

If violations are identified, Comet follows the corrective action procedures defined under the ISO 9001 standard. This includes working collaboratively with suppliers to resolve issues. Persistent noncompliance, however, may result in the termination of the business relationship or legal action, subject to applicable laws.

Comet prioritizes long-term partnerships with reliable suppliers who share our commitment to equal opportunity, prevention of worker mistreatment, and stringent environmental standards. Through regular evaluations and proactive initiatives, we strive to uphold these values throughout our supply chain.

To reinforce accountability, suppliers agree to allow compliance verification through audits, facility inspections, or the review of books and records. This ensures confidence in adherence to the [Supplier CoC](#) and supports our goal of fostering an ethical, sustainable, and transparent supply chain.

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)"

Comet assesses the risk of child labor and human rights violations as low, given its industry focus and the nature of its product and service portfolio. While the electrical and electronic equipment (EEE) industry does face moderate risks of child labor – primarily in upstream supply chains such as raw material extraction and manufacturing in regions with weaker regulatory oversight – Comet minimizes these risks through its robust supply chain management practices. Furthermore, operating in highly regulated regions like Switzerland and the EU ensures stringent compliance with labor standards, further reducing the likelihood of such violations.

Child labor risk in Comet's operations

Comet assesses the risk of child labor in its own operations as negligible due to several key factors:

1. Country risks:

In its "[Children's Rights and Business Atlas](#)" (as at June 2023), UNICEF assesses the risk of child labor for 195 countries and classifies them as "Basic", "Enhanced" and "Heightened". UNICEF classifies six of the nine countries where Comet operates as having a "Basic" risk rating for child labor, indicating a very low likelihood of such violations. These countries are Switzerland, Germany, Denmark, Japan, South Korea, and Taiwan. Among these, the subsidiaries in Japan, Korea and Taiwan are distribution-only entities with minimal reliance on local services and are therefore out of scope for further child labor due diligence. In contrast, China, Malaysia, and the United States have an "Enhanced" risk rating. However, all three in-scope countries have ratified International Labor Organization (ILO) Conventions 138 (minimum working age) and 182 (worst forms of child labor), committing to global standards prohibiting employment under the age of 15. Comet does not have operations in countries with a "Heightened" risk rating.

2. Internal policies and frameworks:

Comet ensures ethical labor practices across all operations. The company adheres to local labor laws, monitored by Global Human Resources to maintain alignment with international standards. Furthermore, Comet's [Code of Conduct \(CoC\)](#) explicitly prohibits child labor underscoring the company's commitment to human rights and responsible business practices.

3. Verification by Global HR:

The Global Human Resources function annually confirms the alignment with ILO Convention 138 using birthdate data in its systems.

4. Customer Audits:

Many of Comet's customers, who operate under stringent regulations regarding child labor, regularly conduct selected on-site audits at our premises. These audits also include an evaluation of

Comet's operations to assess working conditions, verify the ages of workers, and ensure compliance with respective local labor laws. These audits provide an additional layer of oversight. In the reporting year, no concerns regarding child labor in Comet's operations were raised by customers, either directly, through the publicly accessible whistleblower system (Integrity Line) or through the internal audit reviews conducted by the Internal Audit function of Comet.

This comprehensive framework ensures that Comet operates responsibly, reinforcing its commitment to ethical labor practices and human rights.

Child labor risk in Comet's upstream supply chain

The due diligence process regarding child labor is supported by specific steps that are either preliminary to the child labor due diligence process or integrated into the standard Conflict Minerals due diligence process. These steps are documented within the Comet Quality Management System (CQMS) and include the following measures:

- **Screening:** Comet's goal is to select the best global suppliers based on cooperation quality, performance, and strategic importance. The Procurement function evaluates suppliers through self-disclosures and strategic assessments, and conducts supplier evaluations, classification, and development.
- **[Supplier Code of Conduct:](#)** Comet introduced its Supplier Code of Conduct in 2019, with updates in 2021 and 2024. This Code explicitly prohibits child labor and requires suppliers to sign the agreement or provide an equivalent document that confirms compliance with International Labor Organization standards. Comet has recently engaged Assent as an external service provider to oversee the onboarding process and confirm that new suppliers and third parties adhere to these standards.
- **[Responsible Minerals Initiative \(RMI\):](#)** Comet works with the RMI using the Conflict Minerals Reporting Template (CMRT) to monitor and assess child labor risks in raw material sourcing, reinforcing its commitment to ethical and responsible supply chain practices.

To further enhance the effectiveness of the avoidance of child labor, Comet takes a systematic approach to assessing the risk of child labor within the upstream supply chain. This assessment categorizes countries into two groups: "out-of-scope" and "in-scope," based on UNICEF ratings and operational characteristics.

Assessment of reasonable suspicion of child labor – due diligence process

1. **Supplier confirmation:** For all of Comet's suppliers, procurement managers confirm supplier adherence to the Comet [Supplier Code of Conduct](#) or equivalent standards.
2. **Broader assessments:** In addition to supplier confirmation as just described, country general managers and supply chain directors are regularly consulted for insights on potential risks within their regions or supplier networks. These insights may be informed by online or newspaper reports, eyewitness accounts, NGO publications, on-site

inspections, or supplier audits. External research is conducted on supplier practices using credible sources such as NGO reports, media coverage, and audit findings. Comet also operates a publicly accessible Integrity Line, encouraging stakeholders to report concerns about child labor anonymously. To date, no complaints have been reported through this channel.

As a result of the implementation of the processes described above, no reasonable suspicion of child labor, as defined in ILO Convention No. 138 of June 26, 1973, or DDTro, Article 2, Paragraph 1, Letter f., emerged in 2024, either in our own operations or in our upstream value chain.

Diversity, equity, and inclusion

We recognize that respecting diversity, equity, and inclusion (DEI) is not only a social responsibility but also vital for business success. Our [Code of Conduct](#) and equal opportunity employer policy explicitly prohibit discrimination based on nationality, ethnicity, religion, gender, age, sexual orientation, or any other protected characteristic. These policies mandate fair treatment and equal opportunity in all aspects of employment, creating a workplace where all employees feel valued and supported. An updated version of the Code of Conduct was rolled out in 2024, accompanied by mandatory training for all employees.

The commitment to DEI is upheld by all employees, with leadership playing a crucial role in fostering an inclusive culture. Managers are responsible for ensuring fair hiring practices and compliance with DEI policies. The HR department oversees training, reporting, and audits to continuously enhance DEI initiatives.

Core pillars of Comet's DEI culture

Inclusive recruitment practices

Our hiring process is based on objective criteria, including skills, qualifications, and experience, thus ensuring fairness and transparency. We strive to build diverse teams that bring together a variety of backgrounds and perspectives, recognizing that diversity drives creativity and growth.

Gender pay equity

Demonstrating our commitment to equity, we achieved the "Fair-ON-Pay+" certification for gender pay equity at our Flamatt site in 2021, with certification valid for four years. In 2023, we successfully passed

the maintenance audit, reaffirming our adherence to gender pay equity principles. Maintaining this certification requires a follow-up analysis every two years, with recertification due in 2025.

Proactive DEI initiatives

To enhance workplace inclusivity and employee satisfaction, we actively promote open communication and encourage feedback across all levels of the organization. Initiatives to strengthen diversity, equity, and inclusion are integrated into our workplace culture, ensuring that every employee feels valued and supported.

Comet Yxlon: A partner of [European Chips Diversity Alliance](#)

The EU chip sector is undermined by a lack of skilled labor. This shortage is currently being addressed by initiatives such as the Pact for Skills for microelectronics launched by the European Commission, jointly with SEMI Europe. Nonetheless, a shortcoming lies in the fact that the EU chip sector is still considerably male-dominated. Enhanced diversity, equity and inclusion across education, training and industry will empower the "missing talent" to actively participate in the forthcoming acceleration of the EU chips sector. As part of the European Chips Diversity Alliance (ECDA) project, [Comet is committed to closing this talent gap with impactful actions.](#)

To ensure accountability, we conduct regular internal audits, employee surveys, and external reviews. These efforts track compliance with DEI standards and identify areas for improvement. No incidents of discrimination were reported in the year under review.

Our focus on DEI has led to measurable benefits, including enhanced employee satisfaction, higher retention rates, and strengthened innovation. Our efforts contribute to business growth, improved customer and employee satisfaction, and greater competitiveness. While the maintenance audit affirmed the progress made, we remain committed to further advancing DEI to unlock our full potential as a global organization.

Disclosures in accordance with GRI 405-1

Diversity in management (gender)

	Male		Female	
	2024 ¹	2023	2024 ¹	2023
Headcount	152	163	31	35
Percentage	83.1%	82.3%	16.9%	17.7%

Diversity of governance bodies (gender) [%]

	Male		Female	
	2024 ¹	2023	2024 ¹	2023
	Board of Directors ²	57	57	43
Executive Committee ³	86	86	14	14

Diversity of governance bodies (age) [%]

	<30		30–50		>50	
	2024 ¹	2023	2024 ¹	2023	2024 ¹	2023
	Board of Directors ²	0	0	0	14	100
Executive Committee ³	0	0	43	57	57	43

¹ Figures for 2024 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

We recognize that stakeholders expect the company to go beyond economic interests and make positive societal contributions. Social engagement, whether through community projects, environmental initiatives, or local partnerships, is an essential part of our responsibility and integrity. While the double materiality analysis indicates that social commitment is important but not central to management and stakeholders, it remains a critical factor for maintaining our social license to operate, long-term success, and legitimacy.

Our policy emphasizes fostering enthusiasm for technology among the next generation, driven by our conviction that technology enhances education and that fair access to education improves technological progress for sustainable development, safety, and quality of life.

Our approach to direct engagement in society

- At the Group level, we prioritize initiatives in education and technology development. This includes providing training opportunities for young talent and supporting institutions aligned with these goals, fostering a culture of innovation and learning.
- Local management teams play a critical role by driving regional social engagement. They actively participate in community causes and provide support and resources for employee-led initiatives, ensuring that local activities align with our broader values and mission. Our employees are the backbone of our social efforts. Their commitment often sparks local initiatives, with management providing encouragement and the necessary resources to bring these

ideas to life. This collaborative approach strengthens our impact on the communities where we operate.

We demonstrate our dedication to social responsibility through initiatives that promote education, community engagement, and technology-focused activities. These efforts reflect our mission to inspire the next generation and support community well-being. At the Group level, we invest in fostering young talent and enthusiasm for science and technology by providing comprehensive training programs for trainees, interns, and young professionals. These programs equip next-generation experts and leaders with essential skills, preparing them to become future skilled workers.

Our support for institutions like the Technorama science center in Winterthur, Switzerland, further emphasizes our commitment to education. By sponsoring Technorama, we help young minds explore the world of science, igniting curiosity and creativity. Additionally, interactive learning events such as Future Day at the Flamatt site offer young people a hands-on opportunity to experiment with technology, giving them a deeper understanding of its possibilities.

Our regional teams and employees actively contribute to community-focused initiatives, reflecting the company's values and commitment to societal impact. Key activities include participation in charity events like the Annual Joy Drive of the Boys & Girls Clubs of Silicon Valley; the Lam Research Heart & Soles Run in the USA, where proceeds support educational and charitable programs; and a partnership with the Family Giving Tree, a charitable organization committed to serving children and individuals most in need throughout California's Bay Area. In the aftermath of the January 1 earthquake on Japan's Noto Peninsula, our team in Japan provided school supplies, educational resources, and safe spaces for children affected by these challenging circumstances.

Additionally, we hosted youth technology events in 2024 in Hamburg, Penang, and Shanghai, offering hands-on experiences with innovative technologies. These activities aim to inspire the next generation of technologists and foster enthusiasm for science and engineering.

Through these efforts, we underscore our dedication to education and community development, strengthening our reputation as a socially responsible organization that creates lasting positive impacts.

Governance topics

We are committed to ethical and legally compliant behavior in everything we do. Every single point of our [Code of Conduct](#) is non-negotiable. The individual behavior of each of us – how we interact with colleagues, customers, suppliers, and all other stakeholders – determines our success as a company. The values and principles of the Code of Conduct developed in 2020 and updated in 2024 form the foundation of our corporate culture and the basis for all our actions and decisions.

Strict and full compliance with laws, guidelines and regulatory standards at the local, national, and international level is not only the right thing to do, but also an important asset on which our reputation is based. Equally important is the ethical conduct of all individuals and partner organizations we collaborate with, which reinforces our commitment to integrity and trust. All internal and external stakeholders can rely on us to always treat them fairly and ethically. Practicing and upholding proper business ethics is an integral part of our relationships with each other, with our customers, with our suppliers, with our investors and even with our competitors. Ethical behavior is a crucial basis for building trust and ensuring the success of our company. We require all Comet employees to adhere to our Code of Conduct. To ensure that every employee understands the content of our Code of Conduct, we introduced mandatory compliance training some time ago, which every Comet employee must complete on a regular basis.

Ethics and compliance

Ethics and compliance are foundational to our success and integrity. Ethical standards guide moral behavior, while compliance ensures adherence to legal regulations. These principles are critical for maintaining stakeholder trust and loyalty. Our [Code of Conduct](#) mandates compliance with laws and ethical standards for all employees. A key component of this policy is the Integrity Line, a reporting system that enables employees to report concerns about actual or suspected misconduct confidentially and securely.

Our risk and compliance management is structured to ensure accountability and alignment across all levels of the organization, from local sites to the Group level. The Board of Directors plays an overarching role, overseeing the risk management process and ensuring that the organization proactively addresses key challenges. The Audit Committee, a specialized body within the Board, conducts biannual risk assessments and reports significant findings, ensuring transparency and strategic oversight.

In February 2024, the Audit Committee appointed an in-house Group Head of Audit, Risk, and Compliance. This role is responsible for overseeing the [Internal Audit](#) function, managing the enterprise risk man-

agement (ERM) process across the Comet Group, developing and maintaining a Group-level compliance management system (CMS), and operating our global integrity hotline. In 2024, Comet's Internal Audit function conducted eight audits, focusing on [corporate governance](#), compliance with internal and external regulations, risk management, and the design and effectiveness of internal control frameworks.

At the operational level, country general managers are responsible for implementing compliance requirements and issuing policies on critical areas such as health protection and occupational safety. They ensure alignment with local regulations, safeguarding the welfare of employees and adherence to legal standards. Compliance officers, reporting to the country general managers, provide on-the-ground support to divisions and sites. Their role includes monitoring compliance obligations, assisting in policy implementation, and ensuring that local practices meet both regulatory and corporate standards.

We have implemented policies, processes, training, and monitoring measures at the Group level to promote ethics and compliance awareness among employees. The [Integrity Line](#) reporting system allows employees to report concerns about actual or suspected misconduct easily and anonymously. Adjustments to compliance measures are made as needed to meet evolving legal requirements.

As part of our risk management process, material risks are systematically identified and recorded in a risk matrix. Key risks are discussed by the Board of Directors in the context of general business risks. The Group also continuously enhances compliance through policies, training, and improvement measures.

In the year under review, we were not involved in any legal proceedings, nor were fines imposed due to violations of laws or regulations or due to corruption. These outcomes reflect the company's strong commitment to maintaining high ethical and compliance standards.

Technical compliance

Technical compliance refers to the adherence to regulations, standards, and requirements related to both materials and products throughout their lifecycle. It ensures that a company's operations and products meet legal and industry-specific guidelines.

Materials compliance means 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, Evalua-

tion, 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.

Product compliance pertains to the final product meeting all legal and industry requirements for safety, functionality, and environmental performance. This includes certifications, labeling, and documentation proving that the product aligns with relevant standards, such as CE marking, FDA approval, or ISO standards. Product compliance guarantees that products are safe for use and meet the quality expectations of markets and regulatory bodies.

Together, materials and product compliance ensure that the entire process from sourcing to final delivery adheres to rigorous legal and quality standards, supporting a company's commitment to sustainable and responsible business practices.

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 is dedicated to maintaining a high-quality, compliant supply chain that meets product standards and ethical expectations. As described in detail in Comets Quality Management System, our purchasing department evaluates new and existing suppliers, emphasizing sustainable practices and adherence to our [Supplier Code of Conduct](#). As part of our due diligence process, we partner with Assent Compliance Inc. to collect data for REACH, RoHS, Conflict Minerals, and TSCA compliance. Non-compliant suppliers are contacted for corrective action and may face termination if necessary.

Comet imports raw materials and semi-finished products into Switzerland for use in various industrial processes in the semiconductor and non-destructive testing industries. In 2024, we imported 908 kg of tungsten classified under customs tariff number 8101 99 00, exceeding the exemption limit of 350 kg, and thus subject to due diligence requirements per Swiss DDTrO, annex 1, part B. Tungsten and its alloys are mainly used by the Industrial X-ray Modules division as anodes and cathodes in x-ray tubes, added in small amounts to create alloys for electronic components and machining tools.

Comet complies with due diligence under:

- Regulation (EU) 2017/821 and Delegated Regulation (EU) 2019/429

- Dodd-Frank Act Section 1502 on Conflict Minerals

Although Comet is therefore exempt from due diligence obligations under DDTro, article 9, the company implements a structured five-step workflow to monitor suppliers for conflict minerals. This process commences with an annual supply chain campaign conducted by Assent. Comet subsequently reviews the Conflict Minerals Smelters Report, identifies high-risk smelters, and documents follow-up actions within its management system. The purchasing team engages suppliers to request corrective measures and verify conflict-free sourcing. Updated Conflict Minerals Reporting Templates are uploaded, and ongoing compliance is maintained through regular follow-ups, including annual reviews prior to reporting deadlines. Persistent non-compliance is escalated, and suppliers are reassessed as needed.

During the reporting period, all three current tungsten suppliers signed the Comet Supplier Code of Conduct. At the time of writing of this report, one of the suppliers that was added to Comet's supplier list during the reporting year had not yet submitted the Conflict Minerals Reporting Template. However, this was being monitored by the quality manager responsible. We confirm that, in 2024, the due diligence process was conducted as described, and no complaints were reported through our publicly available whistleblower system.

Our commitment to technical compliance reduces risks such as health hazards, environmental damage, and potential legal or financial consequences due to non-compliance. Regular training is provided to employees involved in technical compliance to ensure understanding of regulations and the impact of non-compliance.

Compliance responsibilities are outlined in the Comet Group's management system. The Vice President of Global Operational Excellence (VP GOE), who reports directly to the CEO, sets compliance regulations with input from Group legal experts. The divisions are responsible for implementation, with oversight by the country general managers. Global coordination of materials compliance activities is managed by the Quality & Excellence Board.

This comprehensive structure ensures consistent practices and adherence to regulatory requirements, thus supporting product quality and minimizing risk.

Trade compliance

Trade compliance ensures adherence to laws and regulations governing international trade, including customs regulations, export controls, sanctions, and anti-corruption laws. Comet's Trade Compliance Policy, integrated into the Comet quality management system (CQMS), outlines essential requirements and defines roles and responsibilities. This policy ensures that Comet's operations meet global standards for business, ethics, quality, and supplier and consumer protection. Non-compliance can lead to shipment delays, financial losses, regulatory penalties, and damage to Comet's reputation.

At Comet, trade compliance is managed through a structured approach that ensures clear accountability and authority across all regions. Country general managers are responsible for implementing the Trade Compliance Policy and ensuring adherence to trade regulations within their regions. They are supported by trade compliance officers, appointed for each country, who oversee compliance activities and collaborate closely with trade specialists. Trade specialists are empowered to halt transactions that do not meet regulatory standards. This organizational framework ensures effective oversight and alignment with global trade compliance requirements.

We ensure robust oversight of trade compliance through a structured monitoring system. Country general managers oversee compliance within their regions, supported by trade compliance officers and specialists, who actively monitor transactions and are empowered to halt any non-compliant activities. This proactive approach mitigates risks and ensures adherence to international trade regulations.

In 2024, Comet reported no legal proceedings or fines related to non-compliance with trade laws. This outcome highlights the effectiveness of the Trade Compliance Policy and reaffirms our commitment to meeting global trade standards.

Content index for reporting under Swiss Code of Obligations

The sections of the non-financial report referenced in this content index contain the reporting on non-financial matters in accordance with Article 964a et seq. of the Swiss Code of Obligations, including climate-related disclosures in alignment with the recommendations of the Task Force on Climate-related Disclosures (TCFD).

Content index for reporting under Swiss Code of Obligations, including TCFD

Art. 964a ff. CO requirement	Referenced section in the reporting on non-financial matters
General information	About the report Purpose and business model Sustainability strategy: the Comet way Governance and organization Material topics
Non-financial matters	
Environmental matters	
Climate-related disclosures (aligned with TCFD recommendations)	
Governance	Governance and organization
Strategy (incl. transition plan)	Sustainability strategy: the Comet way
	Climate transition plan
	Risk management: climate-related risks and opportunities
Risk management	Energy management and carbon emissions
Metrics and targets	Sustainability strategy: the Comet way
Other environmental matters	Technical compliance
	Product impact
	Environmental management system and compliance
	Energy management and carbon emissions
Social issues	Responsible supplier standards
	Community engagement
Employee-related issues	Employer attractiveness
	Employee health and safety
	Diversity, equity and inclusion
Respect for human rights	Responsible supplier standards
Combating corruption	Responsible supplier standards
	Ethics and compliance
	Trade compliance

The Board of Directors of Comet Holding AG has approved the report on non-financial matters under the Swiss Code of Obligations for the year 2024 at its meeting on March 4, 2025.

Basis of calculations and definitions

Reporting period

The reporting period covers the period from January 1 to December 31, 2024.

Reporting boundary

The environmental metrics include all locations and companies in Comet's scope of consolidation as listed in the Annual Report. Compared to the 2023 reporting year, the companies within the scope of consolidation have remained unchanged.

Comet has not made any changes to its locations for the calculation of environmental indicators in fiscal year 2024.

Restatements for environmental metrics

Environmental metrics that had been reported in the 2023 Annual Report for the year 2023 are restated in this 2024 report if the deviations from the actual values were significant, meaning if they exceeded $\pm 10\%$ of the total reported figures.

- The energy consumption reported for "heating (total)" was overestimated in the 2023 Annual Report, as shown by the use of actual measurements for recalculations instead of estimated data. The reported total heating figure represented an overstatement of 15.6%, with actual consumption being 1,984 MWh rather than the estimated 2,352 MWh.
- The "fuels (total)" consumption in 2023 projected at the end of 2023 was an underestimate. Actual data revealed additional consumption for emergency generator testing and vehicles owned by the company. Actual consumption in 2023 amounted to 1,014 MWh, instead of the 916 MWh reported in the 2023 Annual Report.
- The two previously mentioned restatements for heating (total) and fuels (total) have reduced Scope 1 emissions in 2023 by 4%. Instead of the 655 tCO₂e reported in the 2023 Annual Report, only 631 tCO₂e were emitted in 2023.
- The methodologies and assumptions used for collecting values for 2024 have been applied retrospectively to actual data from 2023. The consideration of quantities and frequencies of waste removal by waste management companies led to a shift in relative volumes of the reported waste categories. The total reported waste volume for the reporting year did not change significantly compared to the 2023 Annual Report.
- The difference between the water consumption reported for fiscal year 2023 (30,718 m³) in the 2023 Annual Report and the restatement to 24,411 m³ for fiscal year 2023 in the 2024 Annual Report was largely due to overly conservative assumptions made for the Flamatt, Switzerland, site at the end of 2023: Lower production volumes and a smaller workforce, resulting from adjustments in the semiconductor cycle, accounted for 4,732 m³ of the overestimation of water usage.

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.

To obtain 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, including invoices received throughout the year, extrapolations based on the latest available data, or estimates derived from the previous year's figures. The figures reported are based on a data collection and extrapolation processes for 2024 with a closing date in mid-January 2025.

Scope 1 and Scope 2 data is collected continuously, with monthly data as the lowest level of granularity. Data is reviewed twice a year. The first review is for the Annual Report. Data collection ends in the middle of December before the year-end. Missing data is completed with estimates. The second review is for the CDP; here, actual data replaces estimates wherever available.

The share of clean electricity is calculated based on certificates or specific product contracts for locations that purchase 100% of their electricity from low-carbon sources under these contracts. This applies to Flamatt (Switzerland), San Jose (USA), and Hamburg (Germany). For other locations, the share of clean electricity is determined using statistical information from the IEA.

Internal data logs, 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, figures are estimated.

Data control and data plausibility

According to the GHG Protocol, only CO₂ is relevant for Comet, as emissions of the other six greenhouse gases are negligible in this context. In addition, any residual emissions from these gases are already accounted for in the emission factors of the respective energy sources, as these factors are reported in CO₂ equivalents.

Plausibility checks of the reported data are systematically ensured through year-over-year comparisons. For each data collection, as described in the "Data sources and data collection" 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 the ESG team. In the event of values outside a tolerance of $\pm 20\%$, a detailed review is carried out. The ESG team 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 of data evaluation and emission calculations

Collected data is converted to energy quantities. Energy values are then converted into carbon dioxide equivalents (CO₂e) by multiplying them by the corresponding emission factors. Both calculation steps are performed within specialized software. This process complies with the guidelines of "The GHG Protocol Corporate Accounting and Reporting Standard".

Scope 1

For the calculation of Scope 1 emissions, i.e., direct emissions occurring from sources owned or controlled by the company, the specific consumption data is summarized and calculated using the emission factors published by the [British Government, Department for Business, Energy & Industrial Strategy \(BEIS\), UK Government GHG Conversion Factors for Company Reporting](#) issued in 2021. These emission factors are updated regularly to ensure accuracy.

Scope 2 location-based

For the location-based Scope 2 emissions, which represent the indirect emissions from the electricity 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 Our World in Data (OWID) 2023 databases.

Scope 2 market-based

For the market-based Scope 2 emissions, which are emissions calculated based on the contracted energy mixes available on the market, the emission factors are updated annually based on available electricity contracts and certificates of origin. For locations which do not have a certificate of origin or an electricity contract with a specific product, the residual electricity mix applies, which is more carbon-intensive than the country location-based mix. The [emission factors for the residual mix](#) of these countries are sourced directly from the Association of Issuing Bodies (AIB).

In the market-based approach, the emissions are calculated by taking into account the mix of electricity that is actually purchased and the emission factors of the respective technology. The technology-specific emission factors are taken from "[Intep Treibhausgas-Emissionsfaktoren für den Gebäudesektor, Bestimmung von Emissionsfaktoren nach den Bilanzierungsregeln der KBOB und des GHG-Protocols, Version 1.2 vom 23.08.2022](#)".

External audit

The contents of the 2024 Sustainability Report marked in the relevant places were subject to an external audit by Ernst & Young AG to obtain limited assurance regarding the compliance of the reported information with the GRI Standards.

Definitions

Clean electricity/energy refers to electricity/energy sources that are characterized by low emissions of greenhouse gases and of other harmful substances during their generation or use, such as wind, hydro, solar, or nuclear.

Renewable electricity/energy is derived from sources that are naturally replenished on a human time scale. The classification as renewable focuses on the effectively inexhaustible nature of these electricity sources rather than their environmental impact alone.

Employees: Individuals who are in an employment relationship and on the company's payroll according to national law or practice. This excludes individuals performing work on another basis, such as consultants, contractors, agency workers, self-employed, etc.

Permanent employees: Employees with a 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.

Temporary employees: Employees with a contract for a limited period of time (fixed-term contract) that ends when the specific time period expires or when a specific task or event is completed.

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

Management levels: Management levels are based on our global grading structure. The following levels are defined: Employees, Middle Management, Senior Management, and Executive Committee.

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](#).

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

Turnover rate: Rate of departures of permanent employees (voluntary and involuntary departures combined).

Calculation of turnover rate: Total number of departures of permanent employees as a percentage of average headcount of permanent employees during the year.

New entries rate: Rate of arrival of newly hired permanent employees.

Calculation of new entries rate: Total number of newly hired permanent employees as a percentage of average headcount of permanent employees during the year.

Calculation of the ratio of females in management: Number of females in Middle Management, Senior Management, and Executive Committee as a percentage of the total number of individuals employed in the respective levels.



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To the Board of Directors of
Comet Holding AG, Flamatt

Berne, 4 March 2025

Independent Assurance Report on selected KPIs in the Sustainability Report 2024

We have been engaged to perform assurance procedures to provide limited assurance on selected indicators (including GHG emissions) included in Comet Holding AG's and its consolidated subsidiaries' (the Group's) Sustainability Report 2024 for the year ended 31 December 2024 (the Report).

Our limited assurance engagement focused on selected indicators (including GHG emissions) marked with footnotes in the corresponding tables in the Sustainability Report 2024 (the Indicators).

We did not perform assurance procedures on other information included in the Report, other than as described in the preceding paragraph, and accordingly, we do not express a conclusion on that information.

Applicable criteria

The Group defined as applicable criteria (the Applicable Criteria):

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

A summary of the standards is presented on the GRI homepage.

Inherent limitations

The accuracy and completeness of selected indicators (including GHG emissions) are subject to inherent limitations given their nature and methods for determining, calculating and estimating such data. In addition, the quantification of the non-financial matters indicators is subject to inherent uncertainty because of incomplete scientific knowledge used to determine factors related to the emissions factors and the values needed to combine e.g. emissions of different gases. Our assurance report should therefore be read in connection with the Group's "Basis of calculations" chapter including its definitions and procedures on non-financial matters reporting therein.

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 selected indicators (including GHG emissions) in accordance with the Applicable Criteria. This responsibility includes the design, implementation, and maintenance of internal control relevant to the preparation of the Report that are free from material misstatement, whether due to fraud or error.



2

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

Our responsibility

Our responsibility is to express a conclusion on the selected indicators (including GHG emissions) based on the evidence we have obtained.

We conducted our limited assurance engagement in accordance with 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 selected indicators (including GHG emissions) are free from material misstatement, whether due to fraud or error.

Summary of work performed

Procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent 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 a reasonable assurance engagement been performed. Our procedures were designed to obtain a limited level of assurance on which to base our conclusion and do not provide all the evidence that would be required to provide a reasonable level of assurance.

Although we considered management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Our procedures did not include testing controls 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 Applicable 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 Group's key personnel to understand the sustainability or non-financial reporting system during the reporting period, including the process for collecting, collating and reporting the indicators and non-financial information




- ▶ 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

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

Conclusion

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the selected indicators (including GHG emissions) in the Report of the Group 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