

# Sustainability Report 2025

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# Introduction

## Highlights of the year

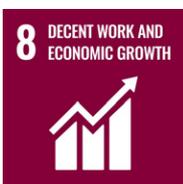
Our environmental, social and governance program serves as a compass for managing our environmental footprint, taking responsibility for our employees, and satisfying the highest standards of compliance and governance. Our focus is on the long term.

In 2025, we achieved further milestones in advancing our sustainability agenda:

Dimension	Achievements in 2025	Ambition
	<ul style="list-style-type: none"> <li>• Target of 80% clean electricity reached</li> <li>• Photovoltaic system in Flamatt fully operational</li> <li>• Group wide eco-design pilot projects completed, eco-design integration into R&amp;D processes initiated</li> <li>• Further progress in developing SBTi targets for validation in 2026</li> <li>• Conducted climate risk assessment for own production sites and selected suppliers</li> <li>• Completed implementation of ISO 14001-aligned, site-specific environmental risk registers</li> </ul>	We strive to minimize our environmental impact through responsible resource management and the integration of environmentally sound practices across our operations.
	<ul style="list-style-type: none"> <li>• Strengthened Comet's cultural foundation by refining our vision and mission as a key pillar of the 2030 strategy and initiated the rollout to all employees</li> <li>• Introduced two tailored people development programs for managers and for leaders, and a global mentoring program</li> <li>• Followed up on the 2024 employee voice survey by translating the findings into concrete actions</li> </ul>	We aim to become the employer of choice by building a supportive and inspiring environment that attracts top talent and delivers long-term value for our employees, business partners, and society.
	<ul style="list-style-type: none"> <li>• Revised various governance documents and launched targeted training sessions for employees:                             <ul style="list-style-type: none"> <li>- Anti-bribery &amp; corruption policy</li> <li>- New authorization framework, including ESG roles &amp; responsibilities</li> </ul> </li> <li>• Zero compliance violations recorded</li> </ul>	We want to achieve excellence in corporate governance by fostering ethical leadership, accountability, transparency, and sustainable value creation.

## Sustainability commitment aligned with global priorities

Comet is committed to aligning its sustainability strategy with globally recognized priorities. We integrate the United Nations Sustainable Development Goals (SDGs) into our core business practices, with a particular focus on SDG 8 (Decent Work and Economic Growth), SDG 9 (Industry, Innovation and Infrastructure), SDG 12 (Responsible Consumption and Production), and SDG 13 (Climate Action).



**Decent work and economic growth:** Our technologies drive the core of digitalization. With a strong tradition in training and mentorship, we support numerous apprentices, trainees, and young professionals, helping them build successful careers. In doing so, we contribute to economic growth, as these emerging talents are essential for developing our innovative products, which play a key role in advancing society's digitalization.



**Industry, innovation and infrastructure:** As a key supplier and partner to the semiconductor and electronics industry, as well as various industrial markets, we collaborate closely with our customers to develop innovative solutions. These solutions drive sustainable progress and enhance safety, security, and quality of life worldwide.



**Responsible consumption and production:** We are committed to avoiding exclusively profit-driven practices that compromise the environment and society. Our goal is to achieve a balance between economic, environmental, and social objectives. To support this, we train and raise awareness among our global workforce about ecological and social issues and engage with customers, suppliers, and other stakeholders in this effort.



**Climate action:** We are committed to addressing climate change and supporting the 2030 Agenda for Sustainable Development. We have developed and are implementing a climate action roadmap focused on reducing our carbon footprint, enhancing energy efficiency, and embedding sustainable practices across our operations to create positive, lasting impacts on the environment and our stakeholders.

As part of our commitment, we joined the UN Global Compact in 2024 and have pledged to uphold its principles on human rights, labor, environment, and anti-corruption. We also support science-based climate action by aligning our targets with the Science Based Targets initiative (SBTi) ([more details in our climate report](#)) and ensure transparency by disclosing our environmental performance through the Carbon Disclosure Project (CDP).

## About this report

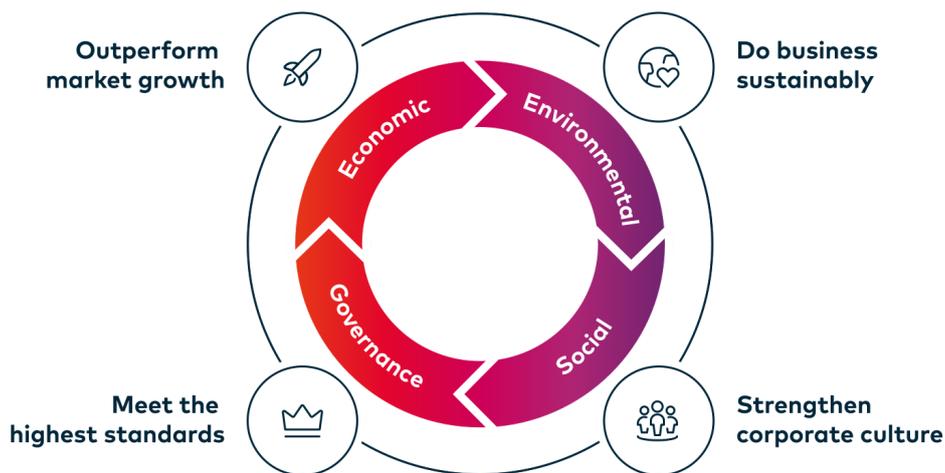
Since 2021, Comet has published annual sustainability reports in accordance with the GRI Standards. This 2025 environmental, social and governance (ESG) report also fulfills Swiss legal requirements for non-financial reporting and is in line with TCFD recommendations on climate disclosures. It covers climate, social, employee, human rights, and anti-corruption topics, with detailed risk and performance metrics. Ernst & Young Ltd (EY) provided limited assurance on selected performance metrics presented in this ESG report. All assured data is marked "► Data externally assured (limited assurance)" (see [assurance report](#) for details).

# Sustainability strategy and roadmap

## Integration of sustainability into business model and strategy

As described in the strategy section of the annual report, sustainability is deeply integrated into Comet's business model as both a core strategic pillar and a guiding principle across all operations, products, and company culture.

Our sustainability vision is to create lasting value for all stakeholders by making a meaningful positive impact on the environment, employees, and communities.



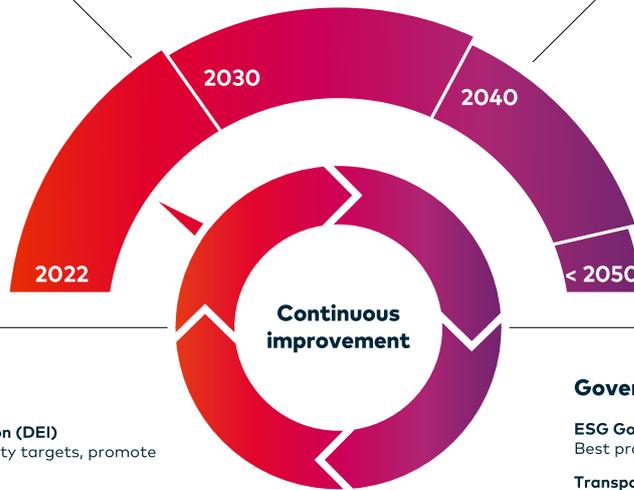
## Strategic priorities

- Balance economic, environmental, and social priorities in decision-making to generate positive impacts.
- Reduce greenhouse gas emissions and promote the use of clean energy.
- Embed sustainability throughout the value chain, from procurement to production, processing, sales, and distribution.
- Develop innovative, sustainable products that help customers achieve their own environmental goals.
- Build fair and transparent relationships with suppliers and partners that reflect our values, and lead by example within the industry.

## Our ESG roadmap

### Environmental roadmap

- Transition to clean electricity
- Analyze and monitor scope 3 emissions along supply chain
- Initiate climate transition plan
- Integrate eco-design principles
- Obtain ISO 14001 certification
- Shift all operations to 100% clean electricity
- Embed circular economy practices
- Strengthen supply chain collaboration to reduce scope 3 emissions
- Achieve net-zero carbon emissions through combination of reductions and verified offsets
- Use advanced technologies, including AI, to optimize environmental performance



### 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

#### 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

## Sustainability governance and organization

Sustainability at Comet is governed at the highest level. The **Board of Directors** oversees and approves the sustainability strategy, including climate-related topics, and reviews and approves the annual sustainability report. The Board is updated quarterly on progress toward sustainability targets, and its committees address specific aspects like eco-design and non-financial elements of executive compensation.

Execution of the sustainability strategy and climate-related transition is delegated to the **Executive Committee**, with the CFO accountable

and acting as sponsor. Compensation incentives tied to performance against targets under the long-term incentive plan (LTIP) ([see compensation report for details](#)) encourage executives to pursue sustainability initiatives, profitable growth, and increased shareholder value.

The Executive Committee is supported by a **Sustainability Board**, chaired by the Vice President of Communications, Investor Relations & Sustainability, which coordinates actions across the company, monitors implementation, and ensures regular quarterly updates.

The Sustainability Board, composed of senior management, meets quarterly to review the progress of ongoing projects and discuss and propose new projects and targets, ensuring alignment with the group’s objectives. Operational implementation occurs in cross-functional project teams within divisions and corporate functions, driving climate- and ESG-related activities throughout the organization.



Our overall approach to sustainability, including our key priorities and commitments, is outlined in our [Sustainability Policy](#). In 2025, Comet also published a new **authorization framework**, including ESG roles and responsibilities, designed to provide clearer guidelines on decision-making and the roles and responsibilities in relation to signatory authority.

It ensures consistency and transparency across all departments and countries, allowing faster and more effective decision processes.

## Risk management

Sustainability and climate-related risks are managed within Comet's comprehensive **enterprise risk management (ERM)** system. The Board of Directors delegates responsibility for assessing the effectiveness of risk management to the Audit Committee (AC) and responsibility for executing the risk management process to the CEO. The Group Head of Audit, Risk, and Compliance oversees the ERM process, compiles semiannual risk reports for the EC and AC and is also part of the Extended Executive Committee and a standing member of the Sustainability Board.

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 Comet's Enterprise Risk Management (ERM) Policy. The policy's intent is to establish the governance, methodology and process for proactively identifying, assessing and mitigating the key risks to Comet and thus ensuring the resilience and success of our operations. For a detailed description of Comet's risk management, see "[Risk management and internal control](#)" in the governance report.

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 "[Climate mitigation and adaptation](#)". In 2025, we substantially expanded our analysis of physical climate risks; the section further outlines our strategic approach to risks and elaborates on Comet's resilience to climate change and transition.

# Materiality and stakeholder engagement

## Materiality assessment

Comet conducted a double materiality assessment (DMA) with reference to the European Sustainability Reporting Standards (ESRS), which was completed in the reporting year. The objective of the DMA was to identify Comet's actual and potential sustainability impacts, risks, and opportunities (IROs). The assessment considered, on the one hand, the impacts of our business activities on society and the environment (impact materiality), and, on the other hand, how sustainability topics may present risks and opportunities for our business (financial materiality).

We applied a structured approach to determine our material topics, considering both our own operations and the entire value chain from materials sourcing to the end-users of equipment containing Comet products. Each of the 94 ESRS 1 sub-(sub-)topics was systematically investigated in the context of Comet, including cross-benchmarking with relevant topics from regulations, reporting standards, and peer companies as well as research using internal sources. This led to an initial screening, in which topics that clearly presented no impacts, risks, or opportunities for Comet were excluded from further evaluation. In the next step, potentially relevant IROs were identified and assessed for the remaining subjects. The evaluation of financial materiality was aligned with the risk categories as defined in Comet's risk management system.

In line with ESRS requirements, stakeholder engagement was a part of the DMA process. Comet had previously conducted an online survey to involve stakeholders: management received a survey focused on financial materiality, while other stakeholders, such as customers, suppliers, investors and Comet employees, were surveyed on impact materiality. The results of this survey served as a plausibility check when identifying potential material topics.

The final selection of IROs was mapped to the respective sustainability matters. These were consolidated into a comprehensive overview of material topics, which were reviewed and validated by the Executive Committee and the Board of Directors. The results of this process reflect Comet's sustainability strategy and business model.

As this sustainability report has been prepared in accordance with the GRI Standards, the material sustainability topics as well are reported on in line with GRI requirements. In total, seven topics were identified as material for Comet. The IROs are described in the chapters on the material topics.

## Material topics



## Stakeholder engagement

At Comet, proactive stakeholder engagement is a key driver of innovation, resilience and long-term growth. We maintain structured dialogue with employees, customers, investors, suppliers, regulators and local communities to align expectations with our strategic direction and sustainability priorities.

With **employees**, we foster open communication through our social intranet, quarterly all-hands sessions, local in-person town halls led by top management, and the "Ask the CEO" channel, complemented by regular employee engagement surveys that inform initiatives on culture, leadership and working conditions.

To meet evolving **customer** needs, we engage through advisory boards and pilot projects, tailoring solutions that address client challenges and uphold high standards of performance and reliability. This customer-centric focus reinforces trust and deepens global partnerships.

In 2025, Comet intensified collaboration with customers and ecosystem partners. For example, we joined the [JOINT3 Consortium](#), where we contribute our advanced x-ray expertise to co-develop next-generation semiconductor packaging and broaden the application scope of our inspection technologies. We also expanded our workforce in regions close to existing or potential customers.

Our **investor** relations activities are based on transparency and trust. With regular briefings, participation in investor conferences and one-on-one meetings, we provide comprehensive updates on financials, strategy and sustainability. In 2025, Comet also held a Capital Markets Day, offering deeper insight into our strategy, technology roadmap and sustainability progress and a dedicated forum for direct exchange with investors.

Our engagement with **suppliers** emphasizes shared values and sustainability. Through collaborative R&D and joint initiatives, we strengthen partnerships that align with responsible business conduct.

Compliance is critical in high-tech industries. We actively participate in **industry groups** and engage with **regulatory bodies** in Switzerland and globally, ensuring adherence to standards and contributing expertise for advancing technology regulations.

Contributing to **communities** is part of Comet's responsibility as a corporate citizen, with a chosen clear focus on education and STEM-related engagement. Comet maintains established educational programs and selectively supports local initiatives near its sites, prioritizing projects that build future skills relevant to its technologies and industry. Through this education-focused stakeholder engagement, Comet helps inspire young people to contribute to a livable future through innovation.

Stakeholder feedback is integrated into the discussions at the level of the Board of Directors and of the Executive Committee on strategy and sustainability, and into the work of the Sustainability Board and cross-functional project teams.

## Environmental topics

### Climate mitigation and adaptation

Climate change poses three main risks to Comet and our business activities: Natural hazards, such as flooding, storms or extreme heat, can cause infrastructure damage or unhealthy working conditions, which might lead to interruptions of our own operations. Beyond this, physical risk events may disrupt the supply chain, resulting in delays and failures in the delivery of purchased goods. Finally, Comet can face reputational and legal risks related to insufficient climate reporting.

At Comet we view climate mitigation and adaptation as essential to both reducing our own negative impacts and building the long-term resilience of our operations, value chain, and stakeholders. 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.

## Climate-related risks and opportunities

### Climate-related physical risks

Climate-related physical risks are typically categorized as either chronic or acute. Chronic physical risks refer to ongoing climate-related challenges, such as generally increased temperatures or persistent water shortages, whereas acute physical risks stem from sudden events like floods or severe storms. Physical risks can lead to direct financial impacts on Comet, including potential damage to company assets and business interruptions as well as supply chain disruptions. Therefore, such risks require protective measures and the allocation of financial resources to safeguard operations.

To methodically evaluate physical risk exposure for Comet's own operations and supply chain, the company conducted a physical risk assessment using a specialized third-party software tool. The assessment covered both Comet's own sites and a number of selected critical suppliers. The outcomes of the assessment are used to inform and update Comet's established supplier risk management processes. As part of the recent supplier strategy, we mitigated supply-chain risk by diversifying our supplier base and reducing reliance on critical suppliers. This strategy has been gradually implemented in recent years and is a core element of strengthening Comet's resilience to climate-related as well as geopolitical risks.

The assessment comprised site-specific evaluations of 12 relevant climate-related hazards under current conditions and for short- (2030), medium- (2040) and long-term (2050) time horizons. These projections were assessed using three commonly applied scenarios based on the framework of the [Intergovernmental Panel on Climate Change \(IPCC\)](#). The scenarios are combinations of socio-economic pathways (SSPs, e.g., SSP1) and so-called representative concentration pathways that identify the warming intensity by a decimal number (e.g., 2.6):

- Sustainability (SSP1-2.6): Global cooperation drives social justice and sustainable development, prioritizing education and poverty reduction. Innovation focuses on decarbonization and circular economy practices. Warming remains below 2°C by 2100.
- Middle-of-the-Road (SSP2-4.5): Development follows current trends with moderate growth and uneven wealth, while climate measures remain gradual. Energy supply mixes fossil and renewables, and societal change is slow. Warming reaches about 3°C by 2100.
- Fossil-Fueled Development (SSP5-8.5): Economic growth and high consumption dominate, powered by cheap fossil energy and weak

global cooperation. Sustainability is sidelined as emissions rise continuously. Warming exceeds 4°C by 2100.

In considering physical risks, it is acknowledged that chronic and acute risks are often intertwined. For instance, acute extreme heat might come on top of chronically increasing temperatures. The following table highlights the top aggregated physical risks and their potential implications on Comet's business model:

	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><b>Operation and supply chain disruptions due to extreme weather and flooding, incl. tropical cyclones (acute)</b></p> <p>Often related to extreme weather, flooding and storm events can both damage assets and cause business interruptions – at some of Comet's own sites as well as within the supply chain. The risk can be mitigated by flood protection measures and supply chain diversification.</p>	●	●	○	●	●	●	○	●	○	○	●	○
<p><b>Risks for staff and production due to increasing temperatures (chronic) and extreme heat (acute)</b></p> <p>These can lead to equipment failures and reduced production efficiency in manufacturing, while also increasing health risks for staff, potentially causing labor disruptions. Higher cooling demand might increase energy costs and set elevated requirements for building adjustments.</p>	●	●	○	○	●	●	○	○	●	●	○	○
<p><b>Supply chain interruption due to heat and drought (acute) as well as aridity and water stress (chronic)</b></p> <p>Supply chain reliability can be scrutinized by supplier's limited access to essential water resources for fabrication and cooling processes. These shortages can increase operational costs and reduce output for Comet's suppliers.</p>	●	○	○	○	●	●	○	●	○	●	○	○

To strengthen the robustness of this conclusion, Comet has now initiated an evaluation of net risk, which incorporates the effectiveness of existing adaptation and mitigation measures across sites and operations. This next step will provide a clearer view of the company's residual exposure and further support transparent, decision-relevant climate risk reporting.

Overall, the assessment concludes that physical climate-related risks do not currently pose a financially material threat to the company. As part of the evaluation, Comet conducted a structured financial analysis to quantify potential impacts on assets, operations, and supply chains across key hazard categories on a gross risk basis.

As well, the existing analysis allows Comet to pinpoint and prioritize potentially exposed links in its value chain and prepare accordingly. For example, a regional hot spot in Southeast Asia was identified where tropical cyclones, storm surges and flooding pose a climate-related hazard risk to the company's own operations and its suppliers. These insights are integrated into Comet's supplier strategy and business resilience planning.

## Climate-related transition risks

The 2025 dedicated physical climate risk assessment complemented the results of the 2024 workshop, in which the Sustainability Board analyzed and reassessed climate-related physical and transition risks and opportunities (see 2024 sustainability report for details). Together with the results of the climate risk assessment, climate risks were again reviewed in the Sustainability Board. While some minor adjustments were made to the assessed impact and probability of physical climate risks, the assessed impact and probability of transition risks and climate opportunities remain the same:

	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><b>Rising costs of raw materials and intermediate goods</b></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 costs of raw materials could increase. In addition, the availability of certain raw materials could be limited due to geopolitical circumstances. Further, operational risks and increased costs might arise from qualifying new suppliers if existing suppliers are unable to meet increasingly stringent ESG and climate requirements. However, rising costs would affect the whole market and would be reflected in pricing.</p>												
<p><b>Regulation of existing products and services</b></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><b>Customer demands for a reduction in CO<sub>2</sub> emissions from products and the transition to energy from renewable sources</b></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><b>Reputation risk: Public demand for continuous review of climate risks and publication of the results of the analyses</b></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>												

Similar to climate-related physical risks, climate-related transition risks do not pose a financially material threat to the company.

## 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 competitiveness. Two climate-related opportunities 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><b>Increased demand for products and services</b></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><b>Electrification</b></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>	○ — ○ ●			○ — ○ ● ○			○ — ● — ○			○ — ● — ○		

Climate change and the global energy transition are accelerating investments in electric vehicles, renewable energy, smart grids, and industrial automation. At the same time, rapidly progressing digitalization and electrification are driving rising demand for advanced semiconductors, batteries, and innovative materials, thus expanding opportunities in non-destructive testing (NDT), quality assurance (QA), and wafer fabrication equipment. Together, these trends increase the need for reliable, safe, and high-performance technologies to support decarbonization and climate resilience.

Climate-related opportunities identified for Comet remain predominantly long-term in nature, and their potential financial benefits are still subject to significant uncertainty.

Based on the currently assessed low likelihood of severe climate-related events, and considering our existing insurance coverage and other financial risk mitigation measures, we do not currently consider a detailed quantification of the anticipated financial effects of climate-related risks and opportunities to be necessary.

## Business resilience

Our assessment of business model resilience to climate change is grounded in a comprehensive evaluation of both physical and transition risks. To understand how identified transition risks and opportunities may affect our future performance, we use climate scenarios to explore plausible future transition developments qualitatively. Consistent with our physical climate-related risk assessment, these scenarios reflect different pathways of greenhouse gas emissions and socioeconomic change, as defined above. In line with TCFD recommendations, we apply two selected scenarios to bound transition risks, to evaluate our ability to adapt and to test the robustness of our strategy under potential climate conditions:

- A "Sustainability" scenario (SSP1-2.6) 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 for Comet.
- In a "Fossil-Fueled Development" scenario (SSP5-8.5), socioeconomic developments such as intensive fossil-fuel use 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 change drastically.

Based on our climate risk assessment, we do not consider our business model to be materially exposed or vulnerable to transition risks under a sustainability-oriented scenario, nor to physical risks under a high-warming scenario. Accordingly, we assess our business model as having strong resilience to potential changes in regulation, market dynamics, and technology, as well as to the increasing frequency and severity of climate-related hazards.

# Climate transition plan

## Main drivers of emissions

In its own operations, Comet designs and manufactures high-precision radio-frequency (RF) and x-ray modules and systems at sites world-wide. Only a moderate amount of emissions comes from using fossil energy for production and building heating (Scope 1). The main internal contributor is the electricity needed to power sites and equipment, accounting for most operational emissions (Scope 2).

Scope 3 emissions arise across Comet's value chain, which extends from the sourcing of specialized materials and components for RF power and x-ray technologies to the long-term use of these products in customers' manufacturing and inspection processes.

Upstream, the company relies on a global network of suppliers for metals, electronics, vacuum components and capital goods. Purchased goods and services for manufacturing Comet's products are the main source of emissions and account for the largest portion of the value chain footprint.

Downstream, Comet's technologies enable critical steps in semiconductor fabrication and industrial x-ray inspection, and most value chain impacts therefore arise from the energy-intensive use of products at customer sites

Shipping processes also play a significant role. The transport of materials to Comet's factories and of products to customers, including time-sensitive logistics, lead to additional emissions from these upstream and downstream activities.

Comet has 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 transitioning 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.

In 2025, Comet began to further develop this climate transition plan in line with the Transition Plan Taskforce (TPT) framework. As a first step, we launched a structured analysis of our decarbonization potential across Scopes 1, 2 and 3, identifying the main levers for emission reductions in our own operations, key supplier categories, transportation and the use of our products by customers.

### Roadmap with SBTi-aligned targets

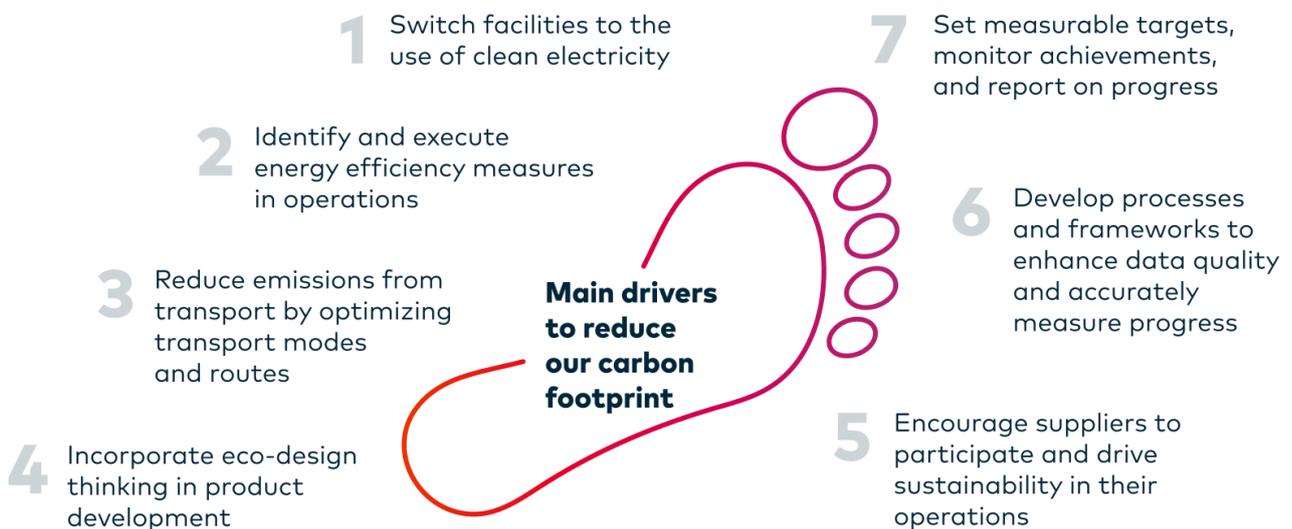
Comet committed to the Science Based Targets initiative (SBTi) at the end of 2024 and is now developing near-term science-based targets, which we plan to submit for validation in 2026. The objectives for Scope 1 and Scope 2 emissions are to align with a global reduction target to keep below a global warming of 1.5°C. Additionally, at least two-thirds of Scope 3 emissions are to be eliminated in line with the SBTi requirements to meet the well-below-2°C temperature 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: Improve the energy efficiency at our production sites, supported by ISO 14001-based environmental management.
- Scope 2 emissions: Gradually increase the share of clean electricity, with the milestone of 100% by 2030 (market-based method)
- Scope 3 emissions: Drive emission reductions across the value chain through logistics optimization and structured engagement with key suppliers, while lowering customer emissions by integrating eco-design into R&D across all divisions.

### Key impact mitigation concepts

To address the climate challenge, we have identified seven 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 it from providers that use low-emission technologies. "Clean electricity" as distinct from "renewable electricity" is our most preferred form of energy. This preference will be formally embedded in Comet's purchasing policy in early 2026. The 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 regard other clean electricity sources as viable low-carbon options that support reductions in greenhouse gas emissions.
- 2 Improving energy efficiency requires identifying meaningful opportunities across operations. 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. Energy efficiency measures at the site level are part of the ISO 14001 targets, driven by the manufacturing sites (see "[Aligning ISO 14001 certification with ESG](#)").
- 3 Where feasible, Comet aims to reduce emissions from transportation in its supply chain by switching to lower-carbon transportation methods and optimizing routes with its logistics partners. 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 making the supply chain for our growing Asia hub in Penang, Malaysia, more regional. 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.
- 4 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 lessons learned into our R&D processes to ensure that sustainability remains an important element in future product development.

- 5 A key element of reducing Comet's climate impacts is the fostering of strong relationships with our suppliers. In 2026, we will launch a phased approach of first identifying areas where collaboration with our suppliers can achieve meaningful reductions in greenhouse gas emissions.
- 6 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.
- 7 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 promotes a strong and trusted Comet brand.

## Eco-design as a key initiative to reduce Comet's carbon footprint

In 2025, Comet further advanced the integration of eco-design principles into its product development. Following the completion of the pilot project in the remaining division, all divisions have now applied eco-design and life cycle assessment (LCA) practices to guide product improvements.

The focus remained on reducing environmental impacts associated with material sourcing and product use (Scope 3 categories 1 and 11). Improvement proposals have been developed for these two areas. The next step involves implementing the possible measures, which range from optimizing standby modes and reusing components to sourcing alternative materials. Building on the results of the pilot projects, eco-design principles are now 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.

# Energy and emissions

At Comet, we strongly believe in our potential to globally promote efficient energy use. 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 sources, as well as optimizing operational processes, we strive to minimize our environmental impact and contribute to combating climate change.

Our operations rely primarily on electricity, making a stable and reliable power supply essential. To prevent disruptions, we have established comprehensive measures to secure electricity procurement, even in emergencies. Through proactive planning, our procurement teams mitigate energy supply risks by diversifying sources, securing backup power, and developing contingency plans with trusted providers. These steps ensure operational continuity and protect production under unforeseen circumstances.

Our products support our customers in improving efficiency and reducing energy consumption per unit of output by enabling non-destructive testing with x-ray technology. Additionally, our technology allows customers to produce smaller, and thus more efficient, electronic components.

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

► Data externally assured (limited assurance)

Environmental metrics		2025 <sup>1</sup>	2024 <sup>1</sup>
<b>Energy consumption (total)<sup>2</sup></b>	<b>MWh</b>	<b>20,758</b>	<b>21,363</b>
<b>Electricity (total)</b>	<b>MWh</b>	<b>17,071</b>	<b>17,922</b>
of which clean electricity	MWh	15,483	11,959
<b>Heating (total)</b>	<b>MWh</b>	<b>2,393</b>	<b>2,098</b>
Heating oil	MWh	81	81
Natural gas	MWh	2,052	1,761
District heating	MWh	260	256
<b>Fuels (diesel, petrol, LPG) (total)</b>	<b>MWh</b>	<b>1,294</b>	<b>1,343</b>
<b>Greenhouse gas emissions (total)</b>	<b>tCO<sub>2</sub>e</b>	<b>2,059</b>	<b>5,703</b>
<b>Greenhouse gas emissions (total)</b>			
<b>Scope 1 (total)</b>	<b>tCO<sub>2</sub>e</b>	<b>779</b>	<b>735</b>
Heating	tCO <sub>2</sub> e	441	382
Fuels (diesel, petrol, LPG)	tCO <sub>2</sub> e	338	353
<b>Scope 2 (market-based) (total)</b>	<b>tCO<sub>2</sub>e</b>	<b>1,280</b>	<b>4,968</b>
Electricity	tCO <sub>2</sub> e	1,236	4,924
District heating	tCO <sub>2</sub> e	44	44
Scope 2 (location-based) (total)	tCO <sub>2</sub> e	4,288	5,056

<sup>1</sup> For the applicable definitions and an explanation of significant deviations from the figures published in the 2024 Annual Report and of the restatements performed, see "Basis of calculations and definitions" (Restatements)

<sup>2</sup> Steam and district cooling is not procured by Comet and is therefore not included in the data presented

Despite higher production volumes, Comet in 2025 slightly decreased its energy consumption, particularly its electricity usage. We further reduced our energy intensity – measured as total energy consumption per million CHF in revenue – from 48.0 MWh/mCHF to 45.4 MWh/mCHF.

Scope 1 emissions increased by 6% year over year, primarily reflecting higher natural gas consumption for heating, driven by operational requirements and weather-related demand.

Scope 2 emissions decreased by 87% compared to the previous year. This was driven primarily by the neutralization of market-based Scope 2 grid emissions at the Penang site through the purchase of Renewable Energy Certificates (RECs). In addition, the locations in Aachen, Germany, and Copenhagen, Denmark, benefited from a full year of renewable electricity supply. Both sites had transitioned to renewable electricity contracts in 2024. In 2025, of the electricity consumed, 224,357 kWh was generated by the company's own photovoltaic system in Flamatt.

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 accounting for almost 99% of total CO<sub>2</sub> emissions. Our improved process indicated Scope 3 emissions of approximately 113,719 metric tons, as reported to CDP in 2025.

The Scope 3 emissions screening conducted in 2025 showed that approximately 90% of the Scope 3 emissions are attributable to Category 1 (Purchased goods and services), Category 11 (Use of sold products) and Category 4 and 9 (Upstream transportation and downstream transportation and distribution). Category 6 (Business travel) and Category 7 (Employee commuting) were also identified as relevant emission sources. All other Scope 3 categories were assessed as not material during the screening process.

While Scope 1 emissions (direct, from company-controlled sources) and Scope 2 emissions (indirect, from purchased electricity) are important levers for near-term GHG reduction, the majority of our emissions stem from Scope 3 sources. After first focusing on understanding and managing Scopes 1 and 2 as the foundation of our carbon reduction efforts, we are now turning to Scope 3 to address the largest share of our footprint and collaborate with suppliers, customers, and partners for long-term value chain impact.

## Resource use and circular economy

Comet imports primarily semi-finished components containing metals such as copper, nickel, chromium, tungsten, and neodymium, several of which are scarce raw materials. Thus, we are heavily dependent on materials that are in very short supply, which poses a long-term risk to our business operations.

Comet generates both **non-hazardous and hazardous waste**. Due to the use and end-of-life disposal of products containing scarce and poorly recyclable materials, we recognize that our business indirectly contributes to resource scarcity. Wherever possible, however, we prioritize recycling within our operations and, given the value of the materials used in our products, customers recycle products at end of life to enable material recovery and help mitigate resource scarcity.

By enabling early defect detection in industrial processes, Comet's non-destructive testing systems inherently help customers reduce scrap and waste, delivering a clear positive impact on resource efficiency and waste prevention.

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

Resource efficiency metrics<sup>1</sup>

		2025	2024 <sup>2</sup>
<b>Waste (total)</b>	<b>t</b>	<b>2,087</b>	<b>1,766</b>
Non-hazardous waste (total)	t	1,936	1,664
- Incineration	t	164	148
- Landfill	t	1,275	1,078
- Recycling	t	497	439
Hazardous waste (total)	t	151	102
- Incineration	t	2	0
- Landfill	t	3	3
- Recycling	t	146	99
<b>Water consumption</b>	<b>m<sup>3</sup></b>	<b>37,082</b>	<b>31,248</b>

<sup>1</sup> Scope covers all of Comet's companies and locations

The increase in waste for 2025 can mainly be attributed to higher production volumes in Penang and Flamatt. Additionally, the remodeling of the Flamatt building resulted in slightly more waste.

Higher production volumes and an increased number of employees led to an overall rise in water use and consumption. An [incident in Flamatt](#) also contributed to this increase. However, the centralization of the water treatment system in Flamatt, which was completed in early 2025, has the positive effect of reprocessing more deionized water than before, which is resulting in a slightly lower underlying level of water use going forward.

We have continued to implement measures to reduce waste. Waste-reduction and resource-efficiency targets are included in our ISO 14001 targets at the site level. One specific local initiative to reduce waste was the introduction of a reuse system for wooden crates used for transportation in Penang, which we implemented in collaboration with one of our customers in 2025.

Comet is embedding circular-economy principles by integrating eco-design into R&D and implementing ISO 14001 at its key production sites to increase material efficiency and recovery. Through continuous research and development, we enhance the durability, reparability, re-manufacturing, and recyclability of our products and packaging.

## Aligning ISO 14001 certification with ESG

ISO 14001 is an operational backbone of Comet's ESG program, translating environmental ambitions on climate, resources, and circularity into structured processes and measurable outcomes. Our goal is to implement ISO 14001 certification across Comet's seven major manufacturing sites by 2028. The first four sites are scheduled for ISO 14001 audits in 2026, and the remaining three sites will follow in the 2027 and 2028 audit cycles. This will ensure a consistent, high-standard environmental management framework.

Comet links global and site targets by using a top-down framework (SBTi-aligned, group-wide goals and roadmap) and bottom-up, site-specific operational targets for key environmental topics. These site targets are designed so that, once consolidated, they drive progress toward the Group targets, including reductions in Scope 1 and selected Scope 3 emissions, as well as in water use and waste of materials. When implementing ISO 14001, processes should be designed to ensure the efficient use of raw materials and minimize production waste. Key measures include recovery mechanisms for valuable materials.

The Group environmental management system in line with ISO 14001 is led at Group level by the VP Global Operational Excellence, while divisional and site management are responsible for local implementation and certification at Comet's major manufacturing sites.

## Social topics

### Attractive working conditions

Qualified and committed employees are a key prerequisite for our past and future success. We recognize the critical importance of being an attractive employer for recruiting and retaining talented employees who contribute to innovation and productivity. As part of attractive working conditions, we value both secure employment and a healthy work-life balance.

In the cyclical semiconductor equipment business, our industry relies on temporary employees during peak demand phases. While such non-permanent employment helps us manage production capacity flexibly, it can also create economic uncertainty for temporary staff due to limited job security. At the same time, Comet is committed to maintaining

stable employment for its permanent employees, even in economically challenging periods.

During economic downturns, we primarily adjust the number of temporary employees. We also use measures such as short-time work, supplemented by top-up payments, to safeguard the employment and income security of our core workforce.

We provide work-life balance options that go beyond regulatory requirements. We offer flexible working time models and remote work arrangements where possible, reduction of working hours for health or family-related reasons, as well as improved maternity leave policies and return-to-work models after parental leave. Comet's human resources team, under the lead of the Chief Human Resources Officer (CHRO), plays a central steering role in shaping attractive working conditions by defining policies, processes and support systems across all our locations. It also supports employees throughout the employment lifecycle, including onboarding, development planning, talent management and support during retirement or other departures, ensuring employees feel valued at every stage.

We continually monitor employee satisfaction and engagement through employee surveys and market benchmarking, providing us with 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.

In 2025, a focus was on following up on the Employee Voice Survey, which was conducted at the end of 2024. The survey identified three key areas for improvement: operational efficiency, learning and development, and feedback and recognition. These findings were translated into initiatives.

Following a significant increase in our workforce in 2024, when our headcount grew across all regions to support the upswing in the semiconductor market, we reduced our recruitment activities in 2025 due to the changing business environment and more challenging and volatile market conditions. Nevertheless, our headcount increased further in 2025 as we continued to invest in key competencies aligned with strategic growth priorities and in our expansion in Penang, Malaysia.

**Disclosures in accordance with GRI 2-7**

## ▶ Data externally assured (limited assurance)

Composition of the workforce<sup>1</sup>

	Male			Female		
	2025	2024	±	2025	2024	±
Workforce by employment contract	1,274	1,228	3.7%	426	407	4.7%
Permanent	1,224	1,182	3.6%	399	385	3.6%
Temporary	50	46	8.7%	27	22	22.7%
Workforce by employment type <sup>2</sup>	1,224	1,182	3.6%	399	385	3.6%
Full-time	1,101	1,062	3.7%	324	312	3.8%
Part-time	123	120	2.5%	75	73	2.7%
Workforce by age group <sup>2</sup>	1,224	1,182	3.6%	399	385	3.6%
<30	140	148	(5.4%)	57	52	9.6%
30-50	697	643	8.4%	243	234	3.8%
>50	387	391	(1.0%)	99	99	0.0%

<sup>1</sup> For definitions of the categories see the section "Basis of calculations and definitions"

<sup>2</sup> Permanent staff only

## ▶ Data externally assured (limited assurance)

Workforce by region

	Europe		Asia		North America	
	2025	2024	2025	2024	2025	2024
Total	1,066	1,039	380	343	254	253
Permanent	1,006	978	372	337	245	252
Temporary	60	61	8	6	9	1

## ▶ Data externally assured (limited assurance)

Workforce by employment type<sup>1</sup>

	Europe		Asia		North America	
	2025	2024	2025	2024	2025	2024
Total	1,006	978	372	337	245	252
Full-time	810	785	372	337	243	252
Part-time	196	193	0	0	2	0

Workforce by category<sup>1</sup>

	2025	Male			Female		
		2024	±	2025	2024	±	
Total	1,224	1,182	3.6%	399	385	3.6%	
Production-related	618	603	2.5%	165	151	9.3%	
Marketing and sales	177	168	5.4%	77	76	1.3%	
General and administration	125	116	7.8%	120	121	(0.8%)	
Research and development	304	295	3.1%	37	37	0.0%	

<sup>1</sup> Permanent staff only

### Disclosures in accordance with GRI 401-1

► Data externally assured (limited assurance)

Rate of employee turnover<sup>1</sup>

		2025	Rate	2024	Rate
Age group	<30	17	8.3%	31	16.4%
	30-50	84	9.1%	93	11.0%
	>50	56	11.4%	43	9.2%
Gender	Male	103	8.4%	114	10.1%
	Female	54	13.6%	53	14.5%
Region	Europe	97	9.6%	104	10.9%
	Asia	34	9.5%	38	12.1%
	North America	26	10.6%	25	10.8%
Turnover		157	9.7%	167	11.1%

<sup>1</sup> Permanent staff only

► Data externally assured (limited assurance)

Rate of voluntary employee turnover<sup>1</sup>

		2025	Rate	2024	Rate
Age group	<30	15	7.4%	21	11.1%
	30-50	52	5.7%	70	8.3%
	>50	21	4.3%	23	4.9%
Gender	Male	55	4.5%	74	6.5%
	Female	33	8.3%	40	10.9%
Region	Europe	54	5.3%	68	7.1%
	Asia	22	6.1%	26	8.2%
	North America	12	4.9%	20	8.7%
Turnover		88	5.4%	114	7.6%

<sup>1</sup> Permanent staff only

New employee hires<sup>1</sup>

		2025		2024	
			Rate		Rate
Age group	<30	58	27.8%	66	35.0%
	30-50	133	14.5%	143	9.6%
	>50	23	4.7%	45	16.9%
Gender	Male	145	12.7%	171	15.1%
	Female	69	18.7%	83	22.6%
Region	Europe	119	11.8%	148	15.6%
	Asia	69	19.1%	64	20.1%
	North America	26	10.6%	42	18.0%
New entries		214	13.2%	254	16.9%

<sup>1</sup> Permanent staff only

A notable reduction in overall turnover – particularly in voluntary turnover, which decreased from 7.6% to 5.4% – contributed to headcount growth. Enhanced retention was achieved across all regions and divisions.

## 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. As we are an industrial manufacturer, our employees are exposed to specific health and safety risks. The use of lasers, the handling of chemicals, and the emission of ionizing radiation in our manufacturing processes and R&D pose potential hazards. There is also a risk of general types of accidents and work-related injuries commonly associated with manufacturing and office work.

Operating in the high-tech semiconductor value chain, we depend on highly skilled specialists in production, sales, product management, and R&D. Illnesses or accidents can therefore create significant operational challenges, as replacing such expertise at short notice is difficult. Safeguarding the health and safety of employees and service providers, and minimizing downtime, is a top priority in our operations.

Our Quality, Environmental, and Health & Safety Policy provides the foundation for occupational safety and health and applies 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.

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"), the ten points of the Federal Coordination Commission for Occupational Safety ("Eidgenössische Koordinationskommission für Arbeitssicherheit", or EKAS) in Switzerland, the

Occupational Safety and Health (Amendment) Act 2022 in Malaysia, and, as the principal federal law in the United States, the Occupational Safety and Health Act, administered and enforced by the Occupational Safety and Health Administration (OSHA). 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 health and safety culture. We track health and safety objectives through continuous process monitoring, regular effectiveness reviews, and annual audits based on location and risk exposure. Deficiencies or violations are reported immediately so that they can be remedied as quickly as possible or avoided in the future, and we strive for improvements in health and safety at work. 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.

All employees are responsible for workplace safety, and each employee should feel physically and mentally fit at work and in the work environment. Therefore, preventive measures are essential for us. Occupational health and safety are regularly addressed through function-specific in-depth instruction and training for at-risk functions and general health and safety training for all employees.

Examples of function-specific training on health and well-being conducted in 2025 include a "Making Shift Work Healthier" workshop for shift workers, which provided guidance on nutrition, sleep, and leisure activities, as well as a "Fit for Work and Life" workshop for apprentices, which addressed risk-aware behavior, sleep, and stress when starting a career.

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

### **Key elements of Comet's comprehensive health & safety culture**

- Workplace safety initiatives: Preventive measures for specific hazards, such as laser use, chemicals, and ionizing radiation, are enforced to protect employees.
- Workshops and information sharing: In addition to workshops on health and well-being, health tips and safety advice 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

	2025	2024	±
Injuries <sup>1</sup>	29	23	26.1%
Lost workdays due to work-related injuries	69	19	263.2%
Lost workdays due to illness	12,363	11,072	11.7%

<sup>1</sup> 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.

Workplace injuries saw a moderate increase in 2025, primarily as a result of headcount growth. Lost workdays due to injuries clearly increased, reflecting a number of cases with longer recovery periods in Germany and Switzerland. However, this is not necessarily linked to the severity of the accidents. Lost workdays due to illness grew in line with headcount growth and normal year-to-year fluctuations.

**Equal treatment and opportunities for all**

At Comet, we regard diversity, equity, and inclusion (DEI) as both a social responsibility and a key driver of business success. Bringing together individuals with diverse backgrounds and perspectives enhances decision-making and fosters innovation. Across all locations, Comet actively promotes cultural diversity and ensures equal access to training, skills development, and career advancement opportunities. These efforts have had a demonstrably positive impact on our workforce.

Our Code of Conduct and Equal Opportunity Policy explicitly prohibit discrimination on the basis of nationality, ethnicity, religion, gender, age, sexual orientation, or any other protected characteristic. An updated version of the Code of Conduct was introduced in 2024 and accompanied by mandatory training for all employees, reinforcing our commitment to fair treatment and equal opportunity.

In 2025, Comet conducted unconscious-bias training for hiring teams – 50% of managers completed the training, with the remaining managers scheduled for 2026. Following the 2025 talent review and the introduction of a renewed promotion framework, diversity among identified future leaders increased across gender, generation, and region, demonstrating that DEI is firmly embedded in our succession and talent management processes.

Responsibility for upholding DEI principles is shared across the organization. Leadership plays a key role in fostering an inclusive culture, while the HR department oversees related training, reporting, and audits. These efforts track compliance with DEI standards and identify areas for improvement. In the year under review, three minor incidents of discrimination were reported and corrective measures taken.

The external gender pay equity certification "Fair-ON-Pay+" obtained for the Flamatt site in 2021 reached the end of its four-year validity in 2025 and Comet opted not to reapply for certification. Instead of re-certification, Comet has prioritized the expansion of its internal equal pay analysis across the entire workforce to further support its commitment to pay equity principles for employees in all countries where it operates.

### Disclosures in accordance with GRI 405-1

► Data externally assured (limited assurance)

Diversity in management (by gender)<sup>1</sup>

	Male		Female	
	2025 <sup>1</sup>	2024	2025 <sup>1</sup>	2024
Headcount	165	152	39	31
Percentage	80.9%	83.1%	19.1%	16.9%

<sup>1</sup> Permanent staff only

Diversity of governance bodies (by gender)

	Male		Female	
	2025	2024	2025	2024
Board of Directors <sup>1</sup>	50.0%	57.1%	50.0%	42.9%
Executive Committee <sup>2</sup>	87.5%	85.7%	12.5%	14.3%

Diversity of governance bodies (by age)

	<30		30–50		>50	
	2025	2024	2025	2024	2025	2024
Board of Directors <sup>1</sup>	0.0%	0.0%	0.0%	0.0%	100.0%	100.0%
Executive Committee <sup>2</sup>	0.0%	0.0%	37.5%	42.9%	62.5%	57.1%

<sup>1</sup> For the definition of "Board of Directors", see the section "Basis of calculations and definitions"

<sup>2</sup> For the definition of "Executive Committee", see the section "Basis of calculations and definitions"

## Comet Yxlon: A partner of the European Chips Diversity Alliance

The EU semiconductor chip sector faces a shortage of skilled labor, a challenge addressed through initiatives such as the Pact for Skills for microelectronics launched jointly by the European Commission and SEMI Europe. At the same time, the sector remains considerably male-dominated. Strengthening diversity, equity and inclusion across education, training and industry can help mobilize untapped talent for the next phase of growth in Europe's semiconductor ecosystem. As part of the European Chips Diversity Alliance (ECDA) project, Comet contributes to closing this talent gap with impactful actions.

In 2025, Comet developed the learning unit "Pathways to Innovation: Diverse Careers in Semiconductor R&D and Software" for educators and career advisors. The course highlights innovation and collaboration in semiconductor technologies and supports educators in inspiring a broader range of learners to consider careers in microelectronics, thus contributing to a more inclusive talent pipeline. The program is also planned to be made available to interested Comet employees.

As well in 2025, [Comet sponsored SEMI Europe's 20 Under 30 Awards](#), underscoring its commitment to nurturing the next generation of semiconductor talent and innovation.

Continuous learning, development, and employee empowerment are central to Comet's culture and support collaboration, customer focus, and efficiency. Comet offers dedicated training at different organizational levels.

On Comet's company-wide e-learning platform, "My Learning," we provide training on policy, compliance, health and safety, and HR processes, as well as role-specific training. We also offer an industry-specific training program, the "Semiconductor Academy", that explains the industry and Comet's role in it. This training was developed internally by experts in the divisions and global functions.

In 2025, we continued to invest in people development with programs for managers and leaders. Our first global management development program, launched in 2024, has been successfully rolled out, with about 200 managers attending at least one module. In addition, a development program for leaders and a global mentoring program for promising key talent within the company were launched.

In 2025, we also introduced a new global mobility policy that provides a clear framework for international assignments. While these assignments support business needs and strategic priorities and strengthen cross-country collaboration and knowledge transfer, they also offer employees valuable international experience and career development opportunities.

Comet supports external continuing education, such as job-related courses, diploma programs, workshops and language training where this strengthens employees' skills and knowledge and is relevant for current or future tasks. While there is no global policy at present, local entities apply their own guidelines and processes, taking into account local labor law, market practice and business needs.

## Product quality & safety and compliance

At Comet, product quality and compliance with all applicable regulations are central to our corporate culture and business success. We are committed to delivering safe, defect-free, and environmentally sound products that support our customers' performance. However, improper application of Comet's instruments may pose health or safety risks to downstream value chain workers who use our products. We therefore continuously strive to mitigate any risks that could compromise product quality or safety.

Improper use of industrial x-ray sources or high-voltage generators can cause serious health hazards, such as exposure to ionizing radiation, electric shock, arc-flash burns, or fire. However, these risks are mitigated by robust product design – including shielding, interlocks, and grounding – in compliance with radiation and electrical safety standards. Installation and operation by trained specialists further ensure safe use.

Similarly, RF generators used in semiconductor production can generate strong radio-frequency fields that may cause burns or heat-stress if improperly shielded. Under normal conditions, modern plasma tools are enclosed, interlocked, and compliant with SEMI EHS standards, keeping exposures well below occupational limits.

Technical compliance at Comet reduces risks by ensuring that products are designed, manufactured and documented in line with applicable technical, regulatory and industry standards throughout their lifecycle, which lowers the likelihood of health hazards, environmental damage, and legal or financial consequences from non-compliance.

The Group-level procedure for technical compliance is documented in Comet's Quality Management System (CQMS) (which integrates materials compliance and product quality/compliance) and in division-specific procedures. These include, for example, certifications by a third-

party notified body for all products of the IXM division, expert inspection by a local notified body at the customer's site for each x-ray inspection system, and evaluation against SEMI S2 environmental, health, and safety guidelines for products used in semiconductor manufacturing equipment, where required by customers.

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, ISO standards, or industry guidelines like SEMI S2. Product compliance helps ensure that products are safe for use and meet the quality expectations of markets and regulatory bodies.

Compliance with global regulations such as Registration, Evaluation, Authorization and Restriction of Chemicals (REACH), Restriction of Hazardous Substances (RoHS), and the Toxic Substances Control Act (TSCA) – as well as with legislation driven by international law and ethics, including conflict minerals legislation, the Dodd-Frank Act and Regulation (EU) 2017/821 – is an indispensable requirement for doing business worldwide.

Customer feedback and issues are systematically tracked across divisions to identify and proactively address potential risks. Employees involved in technical compliance receive regular training to ensure awareness of current standards and the consequences 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, issues 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.

In 2025, no incidents of non-compliance concerning the health and safety impacts of Comet's products and services were reported.

# Governance topics

## Business conduct

At Comet, business conduct reflects our corporate culture and the way we manage relationships across our value chain.

Corporate culture directly influences Comet's ability to attract, engage and retain qualified employees in a competitive labor market, which is critical for delivering our strategy and sustaining long-term value creation. Insufficient investment in this area may lead to increased employee turnover, reduced appeal to qualified professionals in the long run, and erosion of know-how and capacity for innovation, which in turn could negatively impact business performance and stakeholder trust.

Along our value chain, we rely on numerous resources to manufacture our products and provide our services. Our aim is always to use these resources as efficiently as possible and minimize the risks associated with their procurement. We view the responsible management of supplier relationships as an integral part of sound business conduct.

Our interactions with suppliers can generate both positive and negative impacts: fair payment terms and delivery terms can, for example, positively affect our suppliers, while unfair treatment can have the opposite effect. Inadequate management of supplier relationships may also result in reputational damage and the loss of existing partnerships, potentially leading to supply chain disruptions. Such developments would pose a significant risk to our business operations.

At Comet, corporate culture is the combined expression of our purpose, values, ethical principles, vision, mission and behaviors. It is grounded in the values and principles of our Code of Conduct, which form the non-negotiable basis for all actions and decisions and shape how we interact with colleagues, customers, suppliers and other stakeholders. Our culture is anchored in three core values – customer orientation, a mindset to challenge and empower, and trustful collaboration – which guide everyday behavior and decision-making and create the conditions for innovation to thrive.

All employees are required to complete mandatory Code of Conduct training to ensure they understand the Group's values and behavioral expectations, as well as their core compliance duties. Additionally, Comet introduced an updated Anti-Bribery and Corruption (ABC) Policy in 2025, supported by targeted training sessions for specific roles and functions to strengthen the practical application of ABC rules in day-to-day business.

In 2025, Comet further strengthened its cultural foundation by refining the Group's vision and mission as a core pillar of its strategy to 2030. Within this strategic framework, Comet explicitly embeds people and culture, recognizing their critical role in achieving long-term objectives. The Group's values and expected behaviors form the foundation of the strategy and guide how it is implemented across the organization.

Management ensures that the corporate culture aligns with Comet's values and strategic objectives, creating a cohesive framework for success. Leadership teams oversee and monitor key initiatives to drive continuous improvement. At the team level, supervisors facilitate participation in these initiatives and implement measures to ensure alignment with company-wide goals. Regular engagement surveys, such as the Employee Voice Survey conducted in late 2024, provide insight into the employee experience.

Responsible management of supplier relationships means that Comet applies its own standards of lawful, fair and transparent conduct to all interactions with suppliers, embedding these expectations in its Supplier Code of Conduct (Supplier CoC), supplier selection, and ongoing monitoring processes. Through this approach, Comet seeks to prevent human rights violations and environmental harm in its supply chain, reduce climate impacts together with suppliers, and safeguard business continuity by prioritizing reliable, compliant long-term partners.

We are dedicated to maintaining a supply chain that not only meets product performance requirements but also adheres to ethical and sustainable practices, with the Supplier CoC—based on the Responsible Business Alliance (RBA) Code of Conduct—setting clear expectations on legal compliance, the prohibition of corruption and bribery, respect for workers' fundamental human rights, and the prohibition of child labor, which suppliers formally commit to by signing the document and notifying Comet of any known or suspected violations.

## 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 the Comet 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 to adhere to regulations such as REACH, RoHS, Conflict Minerals, and TSCA compliance. Non-compliant suppli-

ers 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 2025, we imported 698 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 under the 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 and are 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. We confirm that, in 2025, the due diligence process was conducted as described, and no complaints were reported through our publicly available whistleblower system.

## 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 of 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 Comet's Internal Audit function.

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 quality of cooperation, on performance, and on 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 confirming 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 child-labor prevention, 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.

Based on 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., arose in 2025, either in our own operations or in our upstream value chain.

# GRI content index



CONTENT INDEX ESSENTIALS  
SERVICE

2026

Comet has reported in accordance with the GRI Standards for the period from 01/01/2025 to 12/31/2025. For the Content Index – Essentials Service, GRI Services reviewed that the GRI content index has been presented in a way consistent with the requirements for reporting in accordance with the GRI Standards, and that the information in the index is clearly presented and accessible to the stakeholders. This service was performed for the English version of the report.

GRI 1 used: GRI 1: Foundation 2021

Applicable GRI Sector Standard: none

## General Disclosures

GRI Standard	Disclosure	Location / information
<b>The organization and its reporting practices</b>		
GRI 2: General Disclosures 2021	2-1 Organizational details	Comet Holding AG <a href="#">Corporate Governance Report, Group structure and shareholders</a> Comet Holding AG, Herrengasse 10, 3175 Wünnewil-Flammatt, Switzerland <a href="#">Annual Report, Review of 2025</a>
	2-2 Entities included in the organization's sustainability reporting	<a href="#">Consolidated financial statements, 02.5 Consolidation</a> All entities in the financial reporting are also included in sustainability reporting
	2-3 Reporting period, frequency and contact point	Annually, fiscal year from Jan 1, 2025, to Dec 31, 2025 <a href="#">Corporate Governance Report, Contacts</a>
	2-4 Restatements of information	<a href="#">Restatements of environmental metrics</a>
	2-5 External assurance	<a href="#">Limited assurance on selected KPIs</a>
<b>Activities and workers</b>		
GRI 2: General Disclosures 2021	2-6 Activities, value chain and other business relationships	<a href="#">Strategy, The Comet Group Purpose and business model</a> <a href="#">Notes to the consolidated financial statements, 01 Nature of the business activities</a> <a href="#">Consolidated financial statements, 02.5 Consolidation Report in Accordance with GRI Standards, Business conduct</a>
	2-7 Employees	<a href="#">Consolidated financial statements, 04.1 Operating segments</a> <a href="#">Report in Accordance with GRI Standards, Attractive working conditions</a> <a href="#">Separate Financial Statements of Comet Holding AG, Number of full-time equivalents</a>
	2-8 Workers who are not employees	By the end of the reporting year, Comet engaged a total headcount of 130 agency and contractor workers who are not employees. The majority of these workers support production, followed by R&D and general administrative activities.
<b>Governance</b>		
GRI 2: General Disclosures 2021	2-9 Governance structure and composition	<a href="#">Corporate Governance Report, Board of Directors and Executive Committee</a> <a href="#">Sustainability Report, Sustainability governance and organization</a>
	2-10 Nomination and selection of the highest governance body	<a href="#">Corporate Governance Report, Board election and terms, Internal organization</a>
	2-11 Chair of the highest governance body	The Chair of the Board of Directors is not a senior executive in the organization

	2-12 Role of the highest governance body in overseeing the management of impacts	<u>Corporate Governance Report, Board of Directors and Executive Committee, Division of authority</u> <u>Sustainability Report, Sustainability governance and organization</u>
	2-13 Delegation of responsibility for managing impacts	<u>Sustainability Report, Sustainability governance and organization</u>
	2-14 Role of the highest governance body in sustainability reporting	<u>Sustainability Report, Sustainability governance and organization</u>
	2-15 Conflicts of interest	<u>Corporate Governance Report, Board of Directors and Executive Committee, Activities and interests outside the Group</u>
	2-16 Communication of critical concerns	Through AGM or other functions (e.g., IR) via CEO. Regular conversations between CEO, CFO and multiple stakeholders.
	2-17 Collective knowledge of the highest governance body	The majority of the members of the Board of Directors are members of the board or management of other listed companies that are advanced in sustainability. Quarterly report on sustainability developments to the Board.
	2-18 Evaluation of the performance of the highest governance body	<u>Corporate Governance Report, Board of Directors and Executive Committee</u> The Board of Directors conducted a self-assessment with an external Board Advisor in 2024. In 2025 the Board of Directors retained a third party consultant to conduct a board evaluation. This evaluation is expected to be completed by the first quarter of 2026.
	2-19 Remuneration policies	<u>Compensation report, 03 Determination of compensation and compensation principles</u> <u>Corporate Governance Report, Nomination &amp; Compensation Committee</u>
	2-20 Process to determine remuneration	<u>Compensation report, 03.1 Determination of compensation</u> <u>Compensation outlook for 2026</u>
	2-21 Annual total compensation ratio	Comparable ratio of 9; CEO annual total compensation compared to median annual total compensation of permanent employees at headquarters in Flamatt, Switzerland
<b>Strategy, policies and practices</b>		
GRI 2: General Disclosures 2021	2-22 Statement on sustainable development strategy	<u>Statement of the Chairman and the CEO</u> <u>Report in Accordance with GRI Standards, Business conduct</u>
	2-23 Policy commitments	<u>Report in Accordance with GRI Standards, Business conduct</u>
	2-24 Embedding policy commitments	<u>Sustainability Report, Report on child labor</u>
	2-25 Processes to remediate negative impacts	<u>Report in Accordance with GRI Standards, Business conduct</u>
	2-26 Mechanisms for seeking advice and raising concerns	<u>Corporate Governance Report Report, Integrity line</u>
	2-27 Compliance with laws and regulations	<u>Report in Accordance with GRI Standards, Business conduct</u> <u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	2-28 Membership associations	SEMI (global industry association that encompasses the entire electronics manufacturing and supply chain), Swissmem, EUROBAT, JIMA (Japan Inspection Instruments Manufacturers' Association), Swiss Malaysian Chamber of Commerce, Swissvacuum

<b>Stakeholder engagement</b>		
GRI 2: General Disclosures 2021	2-29 Approach to stakeholder engagement	<u>Sustainability Report, Stakeholder Engagement</u>
	2-30 Collective bargaining agreements	Less than 5% of employees are covered by bargaining agreements. For employees not covered by collective bargaining agreements, we regularly benchmark the working conditions and terms of employment against organizations with collective bargaining agreements. Overall, our working conditions and terms of employment are superior compared to organizations with collective bargaining agreements. <u>Report in Accordance with GRI Standards, Attractive working conditions</u>
<b>Material Topics</b>		
GRI 3: Material Topics 2021	3-1 Process to determine material topics	<u>Sustainability Report, Materiality assessment</u>
	3-2 List of material topics	<u>Sustainability Report, Material topics</u>
<b>Environmental</b>		
<b>Climate change</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Climate mitigation and adaptation</u>
	302-1 Energy consumption within the organization	<u>Report in Accordance with GRI Standards, Energy and emissions</u> In 2025, none of the electricity generated by Comet's photovoltaic system was sold. All the electricity produced was consumed on site.
	302-4 Reduction of energy consumption	<u>Report in Accordance with GRI Standards, Energy and emissions</u> <u>Sustainability Report, Sustainability strategy and roadmap</u> <u>Sustainability Report, Climate transition plan</u>
GRI 302: Energy 2016	302-5 Reduction in energy requirements of products and services	<u>Sustainability Report, Climate transition plan</u>
	305-1 Direct (Scope 1) GHG emissions	<u>Report in Accordance with GRI Standards, Energy and emissions</u>
	305-2 Energy indirect (Scope 2) GHG emissions	<u>Report in Accordance with GRI Standards, Energy and emissions</u>
GRI 305: Emissions 2016	305-5 Reduction of GHG emissions	<u>Sustainability Report, Climate transition plan</u>
<b>Resource use and circular economy</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Resource use and circular economy</u>
GRI 303: Water and Effluents 2018	303-5 Water consumption	<u>Report in Accordance with GRI Standards, Resource use and circular economy</u>
GRI 306: Waste 2020	306-3 Waste generated	<u>Report in Accordance with GRI Standards, Resource use and circular economy</u>
<b>Social</b>		
<b>Attractive working conditions</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Attractive working conditions</u>
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	<u>Report in Accordance with GRI Standards, Attractive working conditions</u>
<b>Employee health and safety</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>

	403-1 Occupational health and safety management system	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-2 Hazard identification, risk assessment, and incident investigation	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-4 Worker participation, consultation, and communication on occupational health and safety	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-5 Worker training on occupational health and safety	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-6 Promotion of worker health	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
GRI 403: Occupational Health and Safety 2018	403-8 Workers covered by an occupational health and safety management system	<u>Report in Accordance with GRI Standards, Employee Health and Safety</u>
	403-9 Work-related injuries	<u>Report in Accordance with GRI Standards, Employee Health and Safety (table)</u>
	403-10 Work-related ill health	<u>Report in Accordance with GRI Standards, Employee Health and Safety (table)</u>
<b>Equal treatment and opportunities for all</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Equal treatment and opportunities for all</u>
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	<u>Report in Accordance with GRI Standards, Equal treatment and opportunities for all (tables)</u>
	406-1 Incidents of discrimination and corrective actions taken	<u>Report in Accordance with GRI Standards, Equal treatment and opportunities for all (tables)</u>
GRI 406: Non-discrimination 2016		
GRI 404: Training and Education 2016	404-2 Programs for upgrading employee skills and transition assistance programs	<u>Report in Accordance with GRI Standards, Employer Attractiveness</u>
<b>Product quality &amp; safety and compliance</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Product quality &amp; safety and compliance</u>
	416-2 Incidents of non-compliance concerning the health and safety impacts of products and services	<u>Report in Accordance with GRI Standards, Product quality &amp; safety and compliance</u>
GRI 416: Customer Health and Safety 2016		
<b>Governance</b>		
<b>Business conduct</b>		
GRI 3: Material Topics 2021	3-3 Management of material topics	<u>Report in Accordance with GRI Standards, Business conduct</u>
GRI 308: Supplier Environmental Assessment 2016	308-1 New Supplier Screening Using Environmental Criteria	<u>Report in Accordance with GRI Standards, Business conduct</u>
	408-1 Operations and suppliers at significant risk for incidents of child labor	<u>Report in Accordance with GRI Standards, Business conduct</u>
GRI 408: Child Labor 2016		<u>Sustainability Report, Report on child labor</u> <u>Report in Accordance with GRI Standards, Business conduct</u>

GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	<u>Report in Accordance with GRI Standards, Business conduct</u>
GRI 205: Anti-Corruption 2016	205-2 Communication and training about anti-corruption policies and procedures	<u>Report in Accordance with GRI Standards, Business conduct</u>
GRI 205: Anti-Corruption 2016	205-3 Confirmed incidents of corruption and actions taken	<u>Report in Accordance with GRI Standards, Business conduct</u>
GRI 206: Anti-competitive Behavior 2016	206-1 Legal actions for anti-competitive behavior	<u>Report in Accordance with GRI Standards, Business conduct</u>

# 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
<b>General information</b>	<a href="#">About the report</a> <a href="#">Purpose and business model</a> <a href="#">Sustainability strategy and roadmap</a> <a href="#">Sustainability governance and organization</a> <a href="#">Material topics</a>
<b>Non-financial matters</b>	
Environmental matters	
Climate-related disclosures (aligned with TCFD recommendations)	
Governance	<a href="#">Sustainability governance and organization</a>
Strategy (incl. transition plan)	<a href="#">Sustainability strategy and roadmap</a>
	<a href="#">Climate-related physical risks</a>
	<a href="#">Climate-related transition risks</a>
	<a href="#">Climate-related opportunities</a>
	<a href="#">Business resilience</a>
	<a href="#">Energy and emissions</a>
	<a href="#">Climate transition plan</a>
Risk management	<a href="#">Sustainability governance and organization</a>
	<a href="#">Risk management</a>
Metrics and targets	<a href="#">Sustainability strategy and roadmap</a>
	<a href="#">Climate transition plan, SBTi-aligned targets</a>
	<a href="#">Energy and emissions</a>
Other environmental matters	<a href="#">Resource use and circular economy</a>
Social issues	<a href="#">Product quality &amp; safety and compliance</a>
	<a href="#">Business conduct</a>
Employee-related issues	<a href="#">Attractive working conditions</a>
	<a href="#">Employee health and safety</a>
	<a href="#">Equal treatment and opportunities for all</a>
Respect for human rights	<a href="#">Business conduct</a>
Combating corruption	<a href="#">Business conduct</a>

According to the Swiss Ordinance on Climate Disclosures and its Explanatory Report, climate-related disclosures must be released in an internationally recognized electronic format that is both human- and machine-readable. When preparing this annual report and the climate disclosures for 2025, no widely used international electronic format

suitable for climate disclosures was available. For this reason, Comet has not issued its climate disclosures in the recommended XBRL format and has instead continued to publish the report as a PDF.

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 2025 at its meeting on March 4, 2026.

# Basis of calculations and definitions

## Reporting period

The reporting period covers the period from January 1 to December 31, 2025.

## Reporting boundary

The environmental metrics include all sites and companies in Comet's scope of consolidation as listed in the annual report. Compared to the 2024 reporting period, the companies within the scope of consolidation remain unchanged.

Comet has not made any changes to the set of sites included in the calculation of environmental indicators for fiscal year 2025, relative to the previous year.

## Restatements of environmental metrics

Environmental metrics that had been reported for the year 2024 in the 2024 annual report are restated in this 2025 report if the deviations from the actual values were significant, meaning if they exceeded  $\pm 10\%$  of the total reported values.

- The "fuels (total)" consumption reported for 2024 was adjusted following a review of data sources in Germany. The initially reported fuel consumption of 1,064 MWh underestimated actual fuel usage. Upon verification, total fuel consumption for 2024 amounted to 1,298 MWh.
- In line with the adjusted fuel consumption data, Scope 1 "greenhouse gas emissions" for 2024 were also adjusted. Scope 1 emissions increased from the initially reported 280 tCO<sub>2</sub>e to 341 tCO<sub>2</sub>e.
- In addition, the reported volume of "hazardous waste recycled" for 2024 was adjusted in Switzerland. Initial reporting understated the recycled hazardous waste volume. Following data validation, the Group's total hazardous waste recycling for 2024 amounted to 99 tonnes, compared to 84 tonnes initially reported.

## 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 values. The figures reported are based on data collection and extrapolation for 2025, with a closing date in mid-January 2026.

Scope 1 and Scope 2 data are collected on an ongoing basis, with monthly granularity. The data is reviewed twice annually. The first review supports the annual report, with data collection closing in mid-December ahead of the year-end; any data gaps are filled using estimates. The second review supports CDP reporting, during which estimates are replaced with actual data wherever available.

For sites where 100% of electricity is purchased from low-carbon sources, the share of clean electricity is calculated based on certificates or specific supply contracts. This is the case for Flamatt (Switzerland), San Jose (USA), Hamburg (Germany), Aachen (Germany) and Copenhagen (Denmark). For other sites, the share of clean electricity is determined using information from the IEA and other national statistics from publicly available sources.

Internal data logs, external invoices and information from service providers, as well as data provided by landlords, are used to record water consumption, waste volumes and energy consumption for heating and vehicles. If such sources are not available, values are estimated.

#### **Data control and data plausibility**

Under the GHG Protocol, only CO<sub>2</sub> 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 CO<sub>2</sub> 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 site data check the values against the figures for the reporting year to date 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, clarify and correct such data points.

#### **Methodology of data evaluation and emission calculations**

Data collected is converted to energy quantities. Energy values are then converted into carbon dioxide equivalents (CO<sub>2</sub>e) 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 by the WRI/WBCSD. For Scope 2, the default accounting method is the market-based approach. Further details about calculation methods and sources for both Scopes 1 and 2 are described below.

**Scope 1**

For the calculation of Scope 1 emissions, i.e., direct emissions from sources owned or controlled by the company, the specific consumption data is aggregated and calculated using the emission factors published by the [UK Department for Business, Energy & Industrial Strategy \(BEIS\)](#), the "[UK Government GHG Conversion Factors for Company Reporting](#)" issued in 2021. These emission factors will be updated in 2026 to ensure accuracy.

**Scope 2 location-based**

For the location-based Scope 2 emissions, which represent the indirect emissions from the Group's electricity consumption at its sites, the calculation is carried out by multiplying the specific consumption data with the country-specific energy mixes, based on [Our World in Data \(OWID\)](#) 2025 datasets, which contain energy statistics for 2023.

**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 sites that 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 \(AIB\)](#). For countries where no credible residual mixes are available, the country-specific grid mix is applied as a proxy.

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. For both the market-based and location-based approaches, 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**

Ernst & Young Ltd (EY) provided limited assurance on selected performance metrics presented in this ESG report. All assured data is marked in the ESG report as "▶ Data externally assured (limited assurance)" ([see assurance report for details](#)).

**Definitions**

**Clean electricity/energy** refers to electricity/energy sources characterized by low emissions of greenhouse gases and 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 on their environmental impact alone.

**Employees:** Individuals 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, or the self-employed.

**Permanent employees:** Employees with a contract that is not limited by time and/or by the completion of a specific assignment and whose expiry requires certain measures on the part of the employee or 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 defined time period expires or a specific assignment is completed.

**Full-time employees:** Employees whose working hours are defined for a given period in accordance with national laws or practices.

**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:** All members of the [Board of Directors of Comet Holding AG](#).

**Executive Committee (EC):** 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).

**Voluntary turnover rate:** Rate of departures of permanent employees who left the organization voluntarily, i.e., on their own initiative and without it being foreseeable by the company.

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

**Calculation of voluntary turnover rate:** Number of voluntary 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 at the respective levels.



Ernst & Young Ltd  
Schanzenstrasse 4a  
P.O. Box  
CH-3001 Berne

Phone: +41 58 286 61 11  
www.ey.com/en\_ch

To the Board of Directors of  
**Comet Holding AG, Flamatt**

Berne, 4 March 2026

### **Independent Assurance Report on selected KPIs in the Sustainability Report 2025**

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 2025 for the year ended 31 December 2025 (the Report).

Our limited assurance engagement focused on selected indicators (including GHG emissions) (the Indicators) presented in the Report and the Content Index of the Report and marked with the check mark .

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.



#### **Independence and quality management**

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 ISQM 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
- Checking that the calculation criteria have been correctly applied in accordance with the methodologies outlined in the Applicable Criteria



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- 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



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



**EY** Martin Mattes  
Partner (Qualified Signature)