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GRI 3-3-c Policies and commitments

We have developed various policies and instructions to systematically manage the process of innovation development and the implementation of innovations. These are the key policies:

Name of the policy	Description of the policy
Process instruction for the technology roadmap	The process instruction for the technology roadmap describes the management of technical innovation at EEW. The technology roadmap aims to evaluate and prioritise projects developed in Research and Development (see GRI 3-3-d ✓).
Process instruction for project management (evaluation of scenarios)	The process instruction applies to the project leadership and project management of projects that require detailed planning, management and monitoring because of their scope and complexity. It regulates the organisation and schedule of projects and ensures the quality of the processes involved and the results.
Instruction for experience feedback	The instruction for experience feedback (internal and external) describes the technical and organisational steps that must be taken to incorporate findings and experience from operational practice and project development and implementation in planning and operational processes. If quality assurance checks identify deviations, the policy stipulates that any defects that have occurred must be analysed and systematically implemented in measures. The aim is to avoid any further deviations, to identify potential for improvements and to implement optimisation measures.
Process instruction for quality assurance	The instruction serves to ensure continuous quality assurance and applies both to new-build projects and to scheduled and unscheduled downtime as well as for projects involving existing plants.
Central works agreement for idea management	The central works agreement for idea management stipulates how suitable ideas for improvements and innovations are generated, collected, selected, evaluated and applied for use within the company. It also regulates the evaluation of employees' ideas by the examination committees as well as the monetary rewards, implementation, documentation, evaluation and reporting of these ideas (see GRI 3-3-d ✓).

We have committed to compliance with all statutory regulations that are relevant for the development and implementation of innovative processes and technologies. Particular attention is paid to the Patents Act.

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EASY project UPDATE

The EASY project involves the switch to the new ERP system SAP S/4 HANA using cloud technology. As part of this, all end-to-end processes are being reviewed, optimised and digitalised as much as possible, with the aim of increasing process efficiency. With this, we are establishing a platform for standardised and harmonised processes, stability and innovation. Integrated, standardised process workflows lead to greater transparency throughout end-to-end processes, more substantive data owing to comparability, fewer process variants, lower error rates and correction costs as well as higher employee and customer satisfaction. By streamlining processes and cleaning up data, the system will also be more robust and the planning of maintenance and IT operations will become more reliable. Here, we are relying on the latest SAP innovations and cloud technology. This is scheduled to go live in early 2025. In the reporting year, the necessary preparatory activities were carried and the end users were trained.

Information Security Management System (ISMS) project UPDATE

The aim of this project is to introduce a company-wide Information Security Management System (ISMS) to safeguard the availability and functionality of our plants. Within this project, we have already identified and assessed cyber risks. By 2026, we aim to have implemented relevant risk mitigation measures group-wide and have ISMS established throughout the EEW Group. Since January 2024, EEW plants are classified as critical infrastructure according to the Act on the Federal Office for Information Security. The official requirements pertaining to information security are also being implemented with the ISMS project.

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GRI 3-3-e Effectiveness of the actions taken

We want to make increasingly effective use of the opportunities afforded by digitalisation for the circular economy and the energy sector and involve employees in the digi-

talisation of the company. Operational targets, both quantitative and qualitative, were developed for the implementation of digitalisation. These help us to track the effectiveness of the measures, to evaluate progress and to derive findings for our future actions.

Quantitative operational targets	2023 status	2024 status UPDATE
<ul style="list-style-type: none"> – By 2030: Increase efficiency, improve environmental performance and optimise operating resources by implementing up to 16 approaches for the use of AI or model-based process optimisations or their actual application 	<ul style="list-style-type: none"> > Three models are currently being used in plant operations (optimisation phase). At two new plant units, interfaces were implemented from the very beginning. > An AI toolbox developed in-house is being used for the evaluation. 	<ul style="list-style-type: none"> > Two further models were implemented in our plant operations and are being used.
<ul style="list-style-type: none"> – Development and launch of (digitally driven) business models via NEEW Ventures GmbH with at least three economically viable spin-off companies, including financing, by 2027 	<ul style="list-style-type: none"> > The first successful spin-off, WASTEER ↗, was established. Moreover, preparations were underway for a further spin-off in 2024. 	<ul style="list-style-type: none"> > The assets of the Minimise ↗ project were successfully sold.
<ul style="list-style-type: none"> – Nearly paperless execution of company-wide business processes with an annual 10 per cent reduction in pages printed 	<ul style="list-style-type: none"> > Pages printed were reduced by around 6.8 per cent compared with the previous year. Compared to 2018, the number of pages printed were reduced by around 27 per cent. 	<ul style="list-style-type: none"> > Print volumes in the EEW Group were comparable with the previous year.

Qualitative operational targets	Status/progress UPDATE
<ul style="list-style-type: none"> – Development by 2024 of a digital business process model to systematically identify potential for improving efficiency and generating growth 	<ul style="list-style-type: none"> > In the reporting year, the focus was on defining and implementing an end-to-end process model, which will be the foundation for our new ERP system. Based on this, a holistic structured process model and process management will be developed. In the context of the strategy process, we plan to identify additional potential for efficiency gains and performance improvements, which can be achieved by digitalising business procedures. To integrate AI solutions in the company, a concept for a Waste & AI Hub was developed and established within NEEW Ventures GmbH.

The digitalisation measures are predominately organised as individual projects, with assigned budgets and resources, and are managed by project-specific steering groups. This ensures continuous monitoring of the effectiveness and target

achievement (successful conclusion of the projects). The aim of the projects and the resulting optimisations is always the transfer into permanent processes and therefore into the regular organisation.

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GRI 3-3-d Actions taken

We want to shape working conditions and the corporate culture through various measures so that they lead to actual as well as potentially positive impacts. This will prevent potentially negative impacts at the same time. If working conditions have actual negative impacts, we are working to rectify these.

Online training relating to the German General Act on Equal Treatment

All employees are obliged to participate in online training relating to the German General Act on Equal Treatment once a year. This deals with topics such as respect, fairness and mutual respect.

Flexible working time models

We offer flexible working time models, which are governed by collective bargaining agreements and works agreements. In addition to working part-time or flexibly, we allow employees whose work does not require them to be present at all times the option of working from home. This means that they can shape their working day more flexibly and achieve a better work-life balance.

Benefits

We offer our employees the option of an occupational pension scheme in the form of deferred compensation. We have also concluded a group accident insurance policy for all employees and an employer-financed collective occupational disability insurance policy. Employees may also make use of various preventive medical check-ups offered by the occupational medical services (see [GRI 3-3: Employee health and safety](#) ✓).

Social benefits

Social benefits include the provision of fruit and beverages free of charge, financial support with childcare costs including meals, payment of part of the costs of using local public transport or subsidised gym membership.

Employee Assistance Programme UPDATE

In January 2025, a new, independent assistance service was launched for employees and managers at EEW. This Employee Assistance Program (EAP) offers confidential, anonymous assistance for those experiencing work-related and private challenges. The EAP is provided by an external company and provides advice to people dealing with difficult situations and personal, family-related, financial, professional and everyday questions and problems. The telephone service is available all day in German and English. Absolute confidentiality and anonymity are assured by the external advisory service.

Operational idea management

Through idea management, we offer our employees the opportunity to contribute to ongoing improvements in day-to-day operations with their own ideas and thus help to actively shape the company (see [GRI 3-3: Innovation](#) ✓).

Communication channels UPDATE

For us, transparent communication with employees is a key element of an open corporate culture: via the intranet, internal livestream formats or the employee app “EEW2GO”.

Employee events

To strengthen solidarity and employees' identification with their employer, we arrange events such as summer and family festivals, Christmas parties and company outings for our staff.

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GRI 3-3-e Effectiveness of the actions taken

We pursue the strategic objective of achieving a rating of at least “good” in terms of employee satisfaction. Operational targets of a quantitative and qualitative nature were defined to substantiate this target. They help us to manage impacts and track the effectiveness of measures.

Quantitative operational targets	2023 status	2024 status UPDATE
<ul style="list-style-type: none"> Strengthen employee retention and keep resignation numbers at a continuously low level with an employee turnover rate¹ of no more than 5 per cent 	> Turnover rate ¹ at 4.5 per cent	> Turnover rate ¹ at 7.7 per cent

¹ resignations by employees with permanent contracts

Qualitative operational targets	Status/progress UPDATE
<ul style="list-style-type: none"> Develop and introduce the methodology for regular employee surveys in 2023 	> The methodology was developed. We will decide in 2025 when we will launch the survey.
<ul style="list-style-type: none"> Encourage employee participation – voluntary commitment to operational co-determination by preparing a policy on employees’ freedom of association and representation of employee interests in 2023 	> A guideline on freedom of association and co-determination was prepared. Adoption is planned for 2025.

We also use staff appraisals to check the effectiveness of the measures mentioned. Employees and line managers discuss work to date and performance, successes, points of criticism and potential for improvement in these regular feedback meetings. Future goals and collaborative roles are also defined, potential for employee development is identified and development plans are agreed (see [GRI 3-3: Employee development](#) ↙).

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Topic-specific disclosures

GRI 401 Employment

GRI 401-1 New employee hires and employee turnover

New employee hires		2022		2023		2024	
		Number	Rate	Number	Rate	Number	Rate
Total number		196	14.0%	194	13.4%	194	12.7%
By gender	Female	38	2.7%	39	2.7%	45	3.0%
	Male	158	11.3%	155	10.7%	149	9.8%
By age	Less than 30 years old	73	5.2%	74	5.1%	76	5.0%
	30–50 years old	105	7.5%	94	6.5%	97	6.4%
	More than 50 years old	18	1.3%	26	1.8%	21	1.4%
By region	Germany	172	13.7%	174	12.0%	166	10.9%
	Netherlands	22	23.2%	15	15.3%	25	1.6%
	Luxembourg	2	4.3%	5	10.2%	3	0.2%
Employee turnover ¹		2022		2023		2024	
		Number	Rate	Number	Rate	Number	Rate
Total number		118	8.4%	136	9.4%	117	7.7%
By gender	Female	26	1.9%	26	1.8%	20	1.3%
	Male	92	6.6%	110	7.6%	97	6.4%
By age	Less than 30 years old	35	2.5%	42	2.9%	33	2.2%
	30–50 years old	43	3.1%	46	3.2%	41	2.7%
	More than 50 years old	40	2.9%	48	3.3%	43	2.8%
By region	Germany	107	8.5%	121	8.3%	105	6.9%
	Netherlands	10	10.5%	12	12.2%	10	0.7%
	Luxembourg	1	2.1%	3	6.1%	2	0.1%

¹ Includes retirements and expiring temporary contracts

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GRI 401 Employment (continued)

GRI 401-2 Benefits provided to full-time employees that are not provided to temporary or part-time employees

The key benefits are listed in section [GRI 3-3-d](#) in this chapter. The benefits described are generally available to part-time employees as well temporary employees. EEW grants parental leave in accordance with the country-specific statutory provisions.

GRI 401-3 Parental leave

		2022	2023	2024
Total number of employees entitled to parental leave		1,256	1,453	1,523
By gender	Female	212	242	266
	Male	1,044	1,211	1,257
Total number of employees who took parental leave		35	33	28
By gender	Female	16	10	3
	Male	19	23	25
Return to work rate¹ of employees who took parental leave		77.1%	100%	100%
By gender	Female	56.3%	100%	100%
	Male	94.7%	100%	100%

¹ Percentage of employees who returned to work as agreed once their parental leave finished

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Employee health and safety



Our ambition

We protect our own employees and partner companies' staff from hazards in the workplace and in our plants. We raise their awareness of occupational health and safety and safety-conscious behaviour to avoid occupational accidents. In addition, we promote the health of our employees through numerous offerings.



Strategic goals by 2030

- 1) Our overarching objective is to avoid reportable workplace accidents involving our own employees and partner companies' staff.
- 2) Through adequate working conditions and health-promoting measures, we aspire to a health rate of at least 95 per cent for our own employees.



Benchmarks

- 1) Number of accidents (LTI)¹
- 2) Health rate²



Progress in target achievement UPDATE

Benchmark	2023 status	2024 status	2030 target
1-a) Accidents among own workers (see GRI 403-9a ↙)	11 accidents	4 accidents	No accidents among own workers and partner firms' staff.
1-b) Accidents among partner firms' staff (see GRI 403-9b ↙)	3 accidents	7 accidents	
2) Health rate ²	93.8 per cent	93.5 per cent	at least 95 per cent

¹ Lost time injury, number of accidents resulting in time being lost (1 day or more)

² The health rate represents the proportion of our employees' attendance times in relation to the target working hours (contractually agreed working hours). The higher the health rate, the lower the sickness-related absences.



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GRI 3-3-c Policies and commitments

We have implemented various policies to secure the health and safety of our employees to the greatest extent possible. The main policies are listed below.

Name of the policy	Description of the policy
Central works agreements on occupational health and safety	Various central works agreements govern the protection of employees' health and their safety at work. The following topics are covered: Occupational integration management, health management, establishment of light-duty roles, addiction prevention and intervention, risk assessment of psychological stress, and personal protective equipment (PPE).
Instructions on the exercise of activities	We have implemented various instructions and process instructions for exercising various activities correctly, such as for carrying out safety inspections, reporting accidents, risk assessments and implementing hazard assessments.
Luxembourg Declaration for Workplace Health Promotion	We have signed the European Union's Luxembourg Declaration for Workplace Health Promotion and are therefore part of the European network for workplace health promotion. The network has set itself the task of supporting employers, employees and society in ensuring and promoting health and well-being in the workplace.
ISO 45001:2018 Occupational Health and Safety	We have a matrix certification in accordance with ISO 45001:2018 for management systems for health and safety at work from the International Organization for Standardization (ISO). The standard describes requirements for an occupational health and safety management system as well as instructions for implementation.

We have committed to taking account of and observing all statutory and trade association provisions regarding the health and safety of employees. For these topics, section 167 para. 2 SGB (German Social Code) IX, the German Ordinance on Workplaces and the German Working Conditions Act and German Occupational Safety Act plus corresponding ordinances are particularly relevant.

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GRI 3-3-d Actions taken

A variety of occupational health and safety measures serve to prevent or mitigate potentially negative impacts. We counter actual negative impacts with remedial measures. The aim is for occupational health and safety to lead to actual and potentially positive impacts.

Measures to ensure the safety of our employees

Occupational Safety department UPDATE

This central organisational unit supports our sites with expertise on topics relating to occupational safety. In the reporting year, the safety culture was measured and evaluated across the group. Moreover, we presented a safety concept which foresees processes for various occupational safety topics. Implementation of this is planned from 2025.

Personal protective equipment

Our employees receive personal protective equipment tailored to the risk assessment of the respective workplace, along with information material on how to use it.

Hazard assessments

We carry out hazard assessments for all activities in our company to prevent negative consequences. In doing so, hazard factors are assessed and measures to eliminate or reduce them are derived and implemented. These assessments are not only carried out before starting to work in a newly created job but also on a regular basis in response to changes in working conditions. In addition to physical and mental stress factors, potential factors in the working environment are also analysed. The hazard factors therefore serve not only to avoid workplace accidents but also to maintain and improve health.

Safety training

Participation in online training on various aspects of occupational health and safety, such as fire prevention or safety and health labelling, is mandatory once a year for all employees. In these training sessions, our employees receive instructions regarding their conduct and information on potential risks in day-to-day work. Information regarding the proper use of tools, such as ladders, and working at computer screens also form part of the training. An instruction video followed by an online test is compulsory for partner companies' employees. Mandatory safety inspections also take place regularly and first aiders receive training.

Safety alerts

If workplace accidents occur, we have established a process where the causes are analysed in detail and documented, and measures to remedy or avoid them are identified. Managers and employees are informed of accidents and how to deal with them by means of safety alerts.

Safety award

EEW has presented a Safety Award every year since 2013. The assessment criteria include several parameters: the number of accidents, documented safety inspections, the implementation of various activities to protect employees at work and the ratio of completed safety training sessions. Based on a points system, the plant site with the highest number of points in the EEW Group is chosen as the winner each year. The Safety Award is more than just an incentive because the analysis of the results also provides an opportunity to identify potential improvements, which are then implemented across the Group.

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Measures to promote our employees' health

Holistic preventive healthcare and health promotion at the sites

Stavenhagen and Schwedt UPDATE

The holistic health project launched at the Stavenhagen site in 2023 was successfully continued in the reporting year: Since April 2024, a partner firm has also been offering a diverse, needs-based programme suited to shift workers at our Schwedt site, including everything from a “body checkup” to fitness offerings, such as how to take active breaks, and seminars on topics such as “better sleep”.

Occupational medicine and other preventive healthcare

We offer our employees not only the compulsory medical checks and preventive measures prescribed by law but also preventive healthcare on request from our occupational health physicians. Each year, we also arrange or organise different voluntary additional medical screening services, such as health checks, vaccinations, colorectal cancer screening or skin cancer screening. In the reporting year, employees across EEW were offered the opportunity to receive vaccination against influenza.

Health training

Employees are given tips on various occupational health-related topics in compulsory online training sessions that take place once a year. These include, for example, first aid measures or information about addiction prevention and intervention.

Occupational integration management

Should employees be unable to work for a continuous period of more than six weeks within a year or are repeatedly unable to work, we offer them not only the occupational integration management discussion prescribed by law but provide individual help and assistance with reintegration on request. The aim is to prevent staff being unable to work and to keep the job open for the person in question. We work with them to find solutions, should it emerge that their previous job played a role in their inability to work.

Health coordination

Occupational health management at EEW is anchored in the central human resources management department with the position of “Health Coordinator.” The Health Coordinator designs, steers and develops operational structures and processes in order to shape the work, organisation and behaviour in the workplace in such a way that the health of each individual employee is protected.

Flexible working time models

Where possible, we offer our employees flexible working time models within the framework of works agreements (see [GRI 3-3: Working conditions and corporate culture](#)). These include full-time and part-time models as well as arrangements for working from home, which allow staff to achieve a better work-life balance and prevent employees suffering mental stress. The working time models also include a process of gradual reintegration if employees have been off sick for a longer period.

Fitness offerings

As part of our health promotion activities, we offer our employees various options for participating in fitness programmes, such as “fitness at work or home”. Some sites have works agreements on subsidising gym membership. In 2023, we introduced a bicycle leasing scheme for our employees. Since then, 193 employees have taken advantage of this offer, including 54 employees in 2024.

Other health-promoting benefits

We also promote the well-being and therefore the health of our employees by providing fruit and beverages free of charge at the majority of our sites (see [GRI 3-3: Working conditions and corporate culture](#)).

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GRI 3-3-e Effectiveness of the actions taken

We continuously work on preventing workplace accidents involving our own employees and those of partner companies and achieving a high health rate – the strategic objec-

tives are to ensure there are no reportable accidents and that a health rate of at least 95 per cent is achieved. As we work towards achieving the strategic objective, quantitative and qualitative operational targets help us manage impacts and determine the effectiveness of actions taken.

Quantitative operational targets	2022 status	2023 status UPDATE
<ul style="list-style-type: none"> – Strengthening of the supportive measures to reintegrate employees following (longer) time off sick with a rate of at least 50 per cent for completed reintegration discussions being achieved by 2028 	<ul style="list-style-type: none"> > In total, 73 discussions were offered. 19 employees accepted the offer. This is a rate of 26 per cent. 	<ul style="list-style-type: none"> > In total, 94 discussions were offered. 30 employees accepted the offer. This is a rate of 32 per cent.
<ul style="list-style-type: none"> – Avoidance and prevention of workplace accidents through achieving a 100 per cent rate for carrying out occupational health and safety training with a 14-day deadline for the first training session after starting work 	<ul style="list-style-type: none"> > The rate for carrying out training was 94.6 per cent. > A standardised process for carrying out the first training sessions within the specified timeframe will be integrated into the onboarding process in future. 	<ul style="list-style-type: none"> > The rate for carrying out training was 96.9 per cent. > A standardised process for carrying out the first training sessions within the specified timeframe was integrated into the onboarding process.
Qualitative operational targets	Status/progress UPDATE	
<ul style="list-style-type: none"> – Prevention through the range of occupational medical checks by standardising the process and monitoring for mandatory checks and providing more information on the checks available on request 	<ul style="list-style-type: none"> > A concept was developed to harmonise the process and the monitoring as well as strengthen communication. A digital documentation system for this was already introduced at some EEW sites and will be successively rolled out to other sites. 	

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Topic-specific disclosures

GRI 403 Occupational health and safety

GRI 403-1 Occupational health and safety management system

GRI 403-2 Hazard identification, risk assessment and incident investigation

We describe how we identify and assess potential hazards, how we deal with actual accidents and the management approach with which we aim to guarantee health and safety in the workplace pre-emptively in the sections [GRI 3-3-a to e](#) and in the following sections in this chapter.

GRI 403-3 Occupational health services

We provide occupational medical care at each of our 17 plant sites and our administration offices in Helmstedt; the staff there provide advice in accordance with the German Occupational Safety Act, undertake occupational medical screening and health checks. The occupational medical services at each site work with the occupational health and safety specialist, the safety officers, the Works Council, staff responsible for special safety issues, operational teams (such as those responsible for fire prevention, radiation protection and environmental protection, the safety management system) and the central Health Coordinator. The quality assurance of these services is undertaken by a coordinating occupational health physician, who communicates regularly and works with the entities mentioned.

Information about the available services is provided to employees centrally via the intranet and locally through notices posted at the sites. Posters, flyers and information e-mails are also used to communicate special offers.

GRI 403-4 Worker participation, consultation and communication on occupational health and safety

Our employees are directly involved in both compiling hazard assessments and investigating accidents. They have a point of contact for questions regarding occupational health and safety at any time via the safety officers. We also incorporate our employees' experience and suggestions via employer-employee committees, which meet several times a year. The most important bodies are the occupational health and safety committee and the Group-level health steering group. Their responsibilities include planning and offering overarching measures, setting goals and monitoring the defined health budget with the help of a central works agreement. We have also established occupational health and safety committees at site level in accordance with the German Working Conditions Act. Local steering groups for health management consisting of equal numbers of staff and management representatives are also responsible for identifying and implementing site-specific requirements for health measures. Information on health and safety at work is an integral component of our internal communication. Regular occupational health and safety reports are presented in meetings of the Supervisory Board and Board of Management and are submitted weekly to our extended management team. Accidents are systematically evaluated and preventative measures derived from these evaluations. These are announced by means of a safety alert. All offers and internal regulations such as topic-specific works agreements are available to all employees on the intranet.

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GRI 403 Occupational health and safety (continued)

GRI 403-5 Worker training on occupational health and safety

Our overarching objective is to avoid accidents and prevent risks to health. To do so, we rely on a range of preventive measures and raise the awareness of our employees and managers for potential accident risks and hazards. This is achieved through compulsory training at work, for which we use instruction software and/or face-to-face instruction. This means that we can put together an individual, cyclical instruction and training plan that matches the tasks and responsibilities of our employees. This includes various fundamental topics, such as dealing with operating materials, safety in office routines, wearing personal protective equipment and information on first aid. Different training sessions are also prepared for employees and managers.

GRI 403-6 Promotion of worker health UPDATE

A comprehensive health management system provides the basis for our occupational health promotion. As part of this, we offer regular courses and preventive medical campaigns in collaboration with external service providers. The focal points and services offered differ according to the needs and circumstances of the respective sites. Depending on the type of offer, the non-occupational medical health service offerings are announced by the EEW Group's Health Coordinator via our communication channels (for example, intranet, e-mail, flyers, posters).

We offered the following services in the EEW Group in the reporting year: Influenza and COVID-19 (booster) vaccination, online fitness training, a bike leasing scheme and a company running event in aid of charity.

We also provided the following site-specific offers: subsidies for regional fitness offers, company sports groups, active participation in popular sporting events with EEW teams, advice on addiction as well as help with depression, mental stress or similar.

GRI 403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships UPDATE

The certification in accordance with ISO 45001:2018 not only includes all employees, activities and workplaces at EEW but also employees and activities of partner companies and temporary employment agencies, drivers employed by waste suppliers and residue management companies as well as all visitors. We therefore fulfil our responsibility to avoid or significantly mitigate risks and negative impacts on health and safety for all external companies and those present at our sites. Flyers and a compulsory induction video on the topic of occupational health and safety, which is available in 15 languages, also inform partner companies' employees and visitors of possible hazards and point out preventive measures. Partner companies must also instruct their own employees and present a risk assessment for activities to be carried out at our sites. We undertake regular assessments that include occupational health and safety aspects via our supplier management. In addition to signage at all sites and the implementation of the service guideline on minimum safety requirements for logistics companies, a pilot project to introduce regular safety training for company drivers for waste collection and disposal using mobile equipment was successfully completed in the reporting year and has since been implemented at the Heringen site.

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GRI 403 Occupational health and safety (continued)

GRI 403-8 Workers covered by an occupational health and safety management system

To reinforce our zero-accident strategy, we had all sites voluntarily certified as part of a Group certification in accordance with the international standards for occupational health and safety ISO 45001:2018. External auditing for monitoring purposes is carried out once a year. This certification covers all EEW employees as well as employees of partner companies and temporary employment agencies and includes all activities and workplaces.

GRI 403-9 Work-related injuries **UPDATE**

Work-related hazards that pose a risk of high-consequence injuries are identified through risk assessments. As potential hazards, we identified in particular the following injury risks: falling, working with power-driven or non-power-driven equipment, climbing down/twisting an ankle, tripping/ stumbling and electrical accidents. We regularly assess the accident rate on a Group-wide basis systematically and on an ad hoc basis. In doing so, we consider all injuries at work and while travelling, minor injuries and near misses involving all employees. In the reporting year, a total of four recordable work-related injuries involving our own employees and seven lost-time accidents involving employees of our partners companies were recorded. These were caused by falls and stumbles, twisting an ankle and tripping, and when working with power-driven or non-power-driven equipment. In accordance with the applicable hierarchy of controls, we adopted technical as well as organisational and personal protective measures. For example, additional personal protective equipment was issued, workers' awareness of specific hazards was raised, plant parts that can be dangerous were cordoned off or mobile cameras were installed to observe process changes. In accordance with GRI requirements, we report on the number and rate of work-related injuries in the following diagram, firstly for our employees and secondly for all workers that are not EEW employees but whose work and/or workplace is/are controlled by us. The rate indicates how often accidents occur and is calculated from the number of work-related injuries and the number of hours worked, standardised to 1 million working hours.

Workers' accident statistics	2022		2023		2024	
	Number	Rate ¹	Number	Rate ¹	Number	Rate ¹
Number of fatalities as a result of work-related injury	0	0.0	0	0.0	0	0.0
	Number (LTI) ²	Rate (LTIF) ³	Number (LTI) ²	Rate (LTIF) ³	Number (LTI) ²	Rate (LTIF) ³
Work-related injuries with at least one day of absence ²	4	2.0	11	5.3	4	1.8
	Number (TRI) ⁴	Rate (TRIF) ⁵	Number (TRI) ⁴	Rate (TRIF) ⁵	Number (TRI) ⁴	Rate (TRIF) ⁵
Recordable work-related injuries ⁴	5	2.6	13	6.2	5	2.3
Number of hours worked	1,956,086		2,082,124		2,182,528	

¹ calculated on the basis of 1,000,000 hours worked

² Lost Time Injury (LTI); number of accidents resulting in time being lost (1 day or more; excludes fatalities)

³ Lost Time Injury Frequency (LTIF); takes account of accidents where time is lost (1 day or more); calculated on the basis of 1,000,000 hours worked

⁴ Total Recordable Injury (TRI); number of accidents resulting in no time lost (medical treatment, accidents that limit the ability to work, light-duty jobs)

⁵ Total Recordable Injury Frequency (TRIF); takes account of accidents where time is lost as well as medical treatments and accidents that limit the ability to work, light-duty jobs; calculated on the basis of 1,000,000 hours worked

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GRI 403 Occupational health and safety (continued)

GRI 403-9

Accident statistics for workers who are not employees but whose work and/or workplace is controlled by EEW¹

	2022		2023		2024	
	Number	Rate ²	Number	Rate ²	Number	Rate ²
Number of fatalities as a result of work-related injury	0	0.0	0	0.0	0	0.0
	Number (LTI) ³	Rate (LTIF) ⁴	Number (LTI) ³	Rate (LTIF) ⁴	Number (LTI) ³	Rate (LTIF) ⁴
Work-related injuries with at least one day of absence ³	3	3.1	3	2.7	7	6.8
	Number (LTI) ⁵	Rate (TRIF) ⁶	Number (LTI) ⁵	Rate (TRIF) ⁶	Number (LTI) ⁵	Rate (TRIF) ⁶
Reportable work-related injuries ⁵	5	5.1	5	4.5	8	7.8
Number of hours worked	977,144		1,110,889		1,026,202	

¹ Employees of partner companies and temporary employment agencies

² calculated on the basis of 1,000,000 hours worked

³ Lost Time Injury (LTI); number of accidents resulting in time being lost (1 day or more; excludes fatal accidents)

⁴ Lost Time Injury Frequency (LTIF); takes account of accidents where time is lost (1 day or more); calculated on the basis of 1,000,000 hours worked

⁵ Total Recordable Injury (TRI); number of accidents resulting in no time lost (medical treatment, accidents that limit the ability to work, light-duty jobs)

⁶ Total Recordable Injury Frequency (TRIF); takes account of accidents where time is lost as well as medical treatments and accidents that limit the ability to work, light-duty jobs; calculated on the basis of 1,000,000 hours worked

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Employee development



Our ambition

With systematic vocational and skills training as well as employee development, we want to safeguard the quality of our services and increase our innovative strength. We encourage talented employees and utilise modern working methods. We want to reap the advantages of diversity and foster equal opportunity, especially at the leadership level.



Strategic goals by 2030

- 1) We want to enhance our employees' further training by increasing the average number of further training hours per employee to at least 40 hours per year.
- 2) We will increase equality of opportunity with the aim of doubling the share of women in management positions in the EEW Group (baseline 2022: 5.9 per cent).



Benchmarks

- 1) Number of further training days per employee and year
- 2) Percentage of women in management positions



Progress in target achievement UPDATE

Benchmark	2023 status	2024 status	2030 target
1) Number of further training hours per employee and year	The employees used an average of approximately 20 hours for their further training.	The employees used an average of approximately 36 hours for their further training.	On average, at least 40 hours per employee and year.
2) Women in management positions ¹	8 per cent	6.7 per cent	Double the proportion of women in leadership positions compared with 2022

¹ includes: commercial and technical executives, department heads, team heads, shift managers



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GRI 3-3-c Policies and commitments UPDATE

We have one key policy for the promotion and development of our employees.

Name of the policy	Description of the policy
Process instruction for personnel development	The process instruction for personnel development describes the conditions and processes for personnel development. The policy governs the objectives, principles and responsibilities of the central personnel development team, the local responsibilities of the subsidiaries and how they interact.
Central works agreement to establish an EEW Academy	The EEW Academy was established to support all plant sites with commercial/technical further training in the area of production. It is responsible for stakeholder management, needs-based refinement of processes and ensuring the group-wide adherence to quality standards. A central works agreement regulates the related duties and responsibilities of the people involved, the selection process as well as other details of the support offerings.

We have committed to taking account of and observing all statutory provisions regarding the development of our employees. The German Vocational Training Act is of particular relevance in this context.

GRI 3-3-d Actions taken

We develop our employees through various measures that lead to actual and potentially positive impacts – and at the same time prevent or mitigate potentially negative impacts.

Vocational and further training offerings UPDATE

We offer regular training and e-learning sessions to improve employees' technical and personal skills. These are focused on specific specialist topics, digitalisation, leadership, communication and other soft skills. In 2024, more than 200 offerings on a variety of topics and in different formats were provided. Around 1,040 employees took advantage of further training offerings.

Qualification programmes and courses UPDATE

To identify and appropriately develop the multi-faceted potential of our employees, we have introduced various programmes. In the “EEW Leadership Passport” programme, employees with potential are prepared for future management positions and employees with little management experience receive more advanced training. The “EEW Master Passport” programme was launched at our plants to train employees for leadership responsibilities at the foreman level. A total of 27 employees started this programme in the reporting year.

We have established a programme to provide practice-oriented training for young engineers who have recently graduated and/or joined the company. Along the lines of the training to become a power plant operator certified by the German Chamber of Commerce and Industry, we have designed a power plant foreman’s course and operator

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training course in collaboration with Kraftwerksschule Essen which focuses solely on the requirements and particular features of thermal waste utilisation plants.

Apprenticeships UPDATE

We offer the following apprenticeships: electronics engineer for operating technology and for automation technology, specialist in warehouse logistics, industrial technician, mechatronics engineer, industrial manager and office manager. A total of 72 apprentices were employed at EEW in 2024.

We also run a **vocational and further training centre** ↗ in Helmstedt, where commercial apprentices receive instruction from four trainers. Moreover, a range of vocational and further training courses, including numerous seminars and training sessions, is geared to new entrants as well as specialists with professional experience. The focus is on subject-specific practical seminars such as “fundamentals of hydraulics” or “machine-based material processing” but also on topics such as customer-focused behaviour, self- and time management.

Traineeship UPDATE

During an 18-month EEW traineeship, young professionals have the opportunity to get to know company-specific processes, structures, projects and workflows and to help shape these. In addition, they learn the fundamentals of project management and communication and elaborate and implement their own individual development plans.

The trainees are guided by experienced mentors, who offer their advice and assistance. To focus on a more holistic approach to developing young professionals, we plan to redesign the trainee programme in 2025. For example, rotation phases will become a fixture of the programme.

Dual study course UPDATE

In cooperation with the Ostfalia University of Applied Sciences, we make it possible to combine post-secondary studies with integrated vocational training in the fields of electrical engineering (Bachelor of Engineering), mechanical engineering (Bachelor of Engineering) and business management (Bachelor of Arts). Theoretical semesters at EEW’s administrative site in Helmstedt and at Ostfalia University as well as practical sessions during the semester breaks provide young talent with the foundational and practical expertise to enhance their academic studies.

Individual coaching

We offer individual coaching tailored to the needs of employees, teams and managers.

Self-test

Based on our skills model, we have developed a test for employees to evaluate their own skills. The results of this analysis from the voluntary tests allow us to tailor employees’ training to their individual needs.

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GRI 405 Diversity and Equal Opportunity (continued)

Senior managers		2022	2023	2024
By gender	Female	2.7%	2.2%	6.7%
	Male	97.3%	97.8%	93.3%
By age	Less than 30 years old	0.0%	2.2%	2.2%
	30–50 years old	21.6%	33.3%	42.2%
	More than 50 years old	78.4%	64.4%	55.6%
Employees not covered by collective bargaining agreements		2022	2023	2024
By gender	Female	11.1%	14.7%	17.3%
	Male	88.9%	85.3%	82.7%
By age	Less than 30 years old	3.7%	4.0%	5.2%
	30–50 years old	42.6%	42.9%	49.2%
	More than 50 years old	53.7%	53.1%	45.5%
Employees covered by collective bargaining agreements		2022	2023	2024
By gender	Female	17.8%	17.9%	18.1%
	Male	82.2%	82.1%	81.9%
By age	Less than 30 years old	14.3%	14.6%	15.3%
	30–50 years old	47.9%	48.8%	51.0%
	More than 50 years old	37.8%	36.6%	38.8%
Apprentices		2022	2023	2024
By gender	Female	11.4%	10.8%	8.3%
	Male	88.6%	89.2%	91.7%
By age	Less than 30 years old	94.9%	98.6%	97.2%
	30–50 years old	5.1%	1.4%	2.8%
	More than 50 years old	0.0%	0.0%	0.0%
Interns, students, marginal part-time employees ¹		2022	2023	2024
By gender	Female		16.7%	33.3%
	Male		83.3%	66.7%
By age	Less than 30 years old		16.7%	37.5%
	30–50 years old		77.8%	4.2%
	More than 50 years old		5.6%	58.3%

¹ The presentation of the percentage distribution by gender and age in this employee category was added in the 2023 reporting year.

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GRI 405 Diversity and Equal Opportunity (continued)

GRI 405-2 Ratio of basic salary and remuneration of women to men

The remuneration of our employees covered by collective bargaining agreements and of trainees is based on collective bargaining agreements. The groups involved are broken down by activities, with remuneration determined accordingly and regardless of gender. The remuneration of employees not covered by collective bargaining agreements and of senior managers is influenced by these collective bargaining agreements but agreed on an individual basis. Criteria such as areas of responsibility and experience are factored in too. Gender has no influence here.

GRI 406 Non-discrimination

GRI 406-1 Incidents of discrimination and corrective actions taken

	2022	2023	2024
Total number of incidents of discrimination during the reporting period	0	0	0

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Environment

MATERIAL TOPICS

Waste (input)

Energy (output)

Climate-relevant emissions (output)

(Other) output materials/resources



Our engagement for the Sustainable Development Goals (SDGs)



AREA OF ACTION

Value chain

MATERIAL TOPIC

Customer relationships



Our engagement for the Sustainable Development Goals (SDGs)

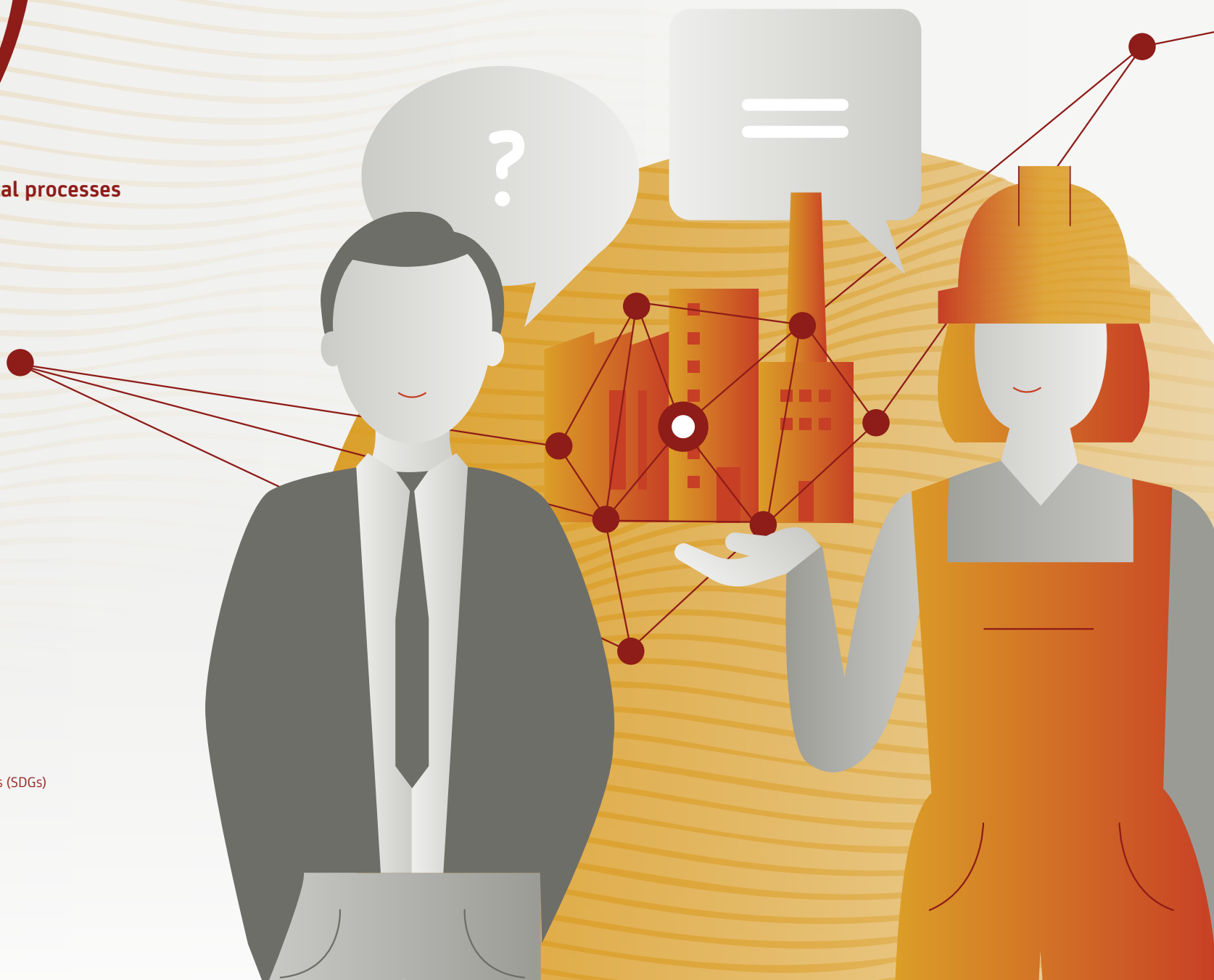


AREA OF ACTION

Society

MATERIAL TOPIC

Participation in political and societal processes



Our engagement for the Sustainable Development Goals (SDGs)



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Topic-specific disclosures

GRI 415

Political influence

Political contributions

GRI 415-1

Contributions to political parties, political foundations and other political groups are ruled out in principle in accordance with internal directives.

	2022	2023	2024
Total monetary value of political contributions (in euros)	0	0	0

Stakeholder engagement



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GRI 2-29 Approach to stakeholder engagement

The impacts of our business activities on the economy, the environment and society affect the interests of various stakeholders. These include employees, business partners, politicians, the scientific community and the public as well as associations and lobby groups.

We identified and defined our stakeholder groups as part of the preparations for our first Sustainability Report in 2018. All relevant areas of the business were involved in this and each identified and described the individual people and groups with whom they have close dealings. We then combined these into interest groups.

On a project-specific basis, we have and will continue to regularly identify and increasingly engage further stakeholders. For example, members of the public and local residents near the sites where we are implementing local projects belong to the core stakeholder groups.

On our journey towards a more sustainable future, we are systematically involving interest groups identified as relevant to EEW at both a Group level and site/project level. The Corporate Sustainability team steers stakeholder management relating to sustainability aspects at EEW. In the course of regular discussions with stakeholders or via targeted surveys (see [GRI 3-3: Customer relationships](#) ✓), we ascertain their expectations relating to our business activity and our engagement for sustainability as well as their views on key issues. Their views and concerns play a part in shaping company policy and help

us manage material topics in a targeted manner. In particular, this means avoiding or reducing negative impacts and enhancing positive impacts.

We use various communication formats to engage our stakeholders: through both personal contact, at events for example, as well as information provided via various media. In this way, we promote transparency through our online presence, press releases, newsletters and posts on social media. Direct interaction takes place, for example, at various dialogue formats such as public debates, meetings of associations and specialist conferences. It also occurs at our booth during trade fairs, at accompanying presentations and during tours of our plants. Within the company, we use, among other things, the intranet, video formats, corporate gatherings and the EEW employee app to continuously communicate with our employees.

In future, we want to engage our stakeholders even more closely in our business activities. We have therefore set ourselves the goal of offering and hosting at least five dialogue events per year and site on topics relating to the circular economy and the energy sector (see [GRI 3-3: Participation in political and societal processes](#) ✓). We also strive to adopt a systematic approach to surveying employee and customer satisfaction, so that we can address their needs even more effectively (see [GRI 3-3: Customer relationships](#) ✓ and [GRI 3-3: Working conditions and corporate culture](#) ✓).

As part of the preparations for the application of the Corporate Sustainability Reporting Directive (CSRD), we will once again review and adapt, if necessary, our approach to stakeholder engagement.



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Target groups for our stakeholder management

Our business activity – thermal utilisation of municipal and commercial residual waste as well as sewage sludge – and the associated use of energy from waste to generate

steam, heat and electricity have impacts on the economy, the environment and society and therefore affect the concerns of various stakeholders. So on our journey towards a more sustainable future, we are fostering systematic engagement with all relevant stakeholders.



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GRI 3-3-f Engagement of interest groups in the management of actions taken

Our activities do or may affect various individual people or groups. So it is important to make sure that those affected become involved in shaping our measures and assessing their effectiveness.

As part of our materiality analysis in 2022, we asked a representative selection of members of our stakeholder groups to tell us how they rate our sustainability performance at the level of individual actions and topics and what they expect from EEW. We did not explicitly ask how stakeholders rate the measures we have implemented and how effective they find them to be. Nevertheless, we were able to draw indirect conclusions from the answers provided to help shape our future portfolio of measures. The expectations of our stakeholders were taken into account, particularly in terms of defining material topics and developing goals and benchmarks for our sustainability roadmap, and will therefore influence our commitment to sustainability in future too.

With the survey, we not only concentrated on interest groups relevant to our business activity, but also conducted interviews with representatives from all groups actually or potentially affected – meaning representatives from society, business, politics and academia as well as customers and suppliers. The results of the survey can be found in

the [Overview of stakeholder expectations and feedback](#) ↗. Here we outline not just the expectations our interest groups, but also a summary of how we intend to satisfy these in future.

At an operational level, our departments are already in close contact with the relevant affected stakeholders, for example, at events with customers and other stakeholder representatives and through ongoing transparent communication (see [GRI 3-3: Customer relationships](#) ↗ and [GRI 3-3: Participation in political and societal processes](#) ↗). Further examples are listed under GRI 3-3-d/e of each material topic.

If you have any suggestions, ideas, questions or criticism you wish to share with us, please contact us by e-mail at nachhaltigkeit@eew-energyfromwaste.com ↗.

Stakeholder expectations and feedback

The survey of selected stakeholder representatives was conducted as part of our materiality analysis in 2022. Our engagement was therefore rated across all potentially material topics (see chapter [Sustainability strategy](#) ↗). The expectations and feedback were fed into the subsequent process of identifying our 12 material topics and were also taken into account when our [sustainability roadmap](#) ↗ was being developed.

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TOPICS	STAKEHOLDER EXPECTATIONS AND FEEDBACK	OUR RESPONSES
<p>General</p> <ul style="list-style-type: none"> > Sustainability engagement > Shareholder > Intentions 	<ul style="list-style-type: none"> – Continuing to assume responsibility and act as a role model for reliable waste management and energy supply – Advancing the transition from waste utilisation to reclaiming resources – Stepping up commitment to all aspects of sustainability (environmental, economic and social) – Credibility in ensuring due diligence in human rights and environmental matters is questioned due to ownership structure 	<p>We take on responsibility and manage our day-to-day conduct in accordance with our Sustainability strategy by trying to strike a balance between the various aspects of sustainability. Our sustainability roadmap summarises the goals we wish to achieve by 2030. Independent of the ownership structure, it has long been important to us to observe due diligence obligations in human rights and environmental matters. Our Policy statement lays out our commitment to the respect of human rights and environment-related obligations. We have implemented a risk management system in accordance with the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) and appointed a Human Rights Officer (see GRI 3-3: Ethics and integrity).</p>
<p>Company</p> <ul style="list-style-type: none"> > Ethics and integrity > Value creation > Transparency and dialogue > Innovation and digitalisation 	<ul style="list-style-type: none"> – Fostering greater transparency and dialogue – Accelerating innovations and digitalisation as key factors on the journey to greater sustainability 	<p>Since 2018, we have been disclosing non-financial information through our annual sustainability reporting. We transparently disclose our output materials (see GRI 3-3: (Other) output materials/resources, GRI 306-3 to 306-5 and input-output model). We describe how we deal with topics classified as “material” in the relevant chapters (see GRI 3-3: Innovation and GRI 3-3: Digitalisation).</p>
<p>EMPLOYEES</p> <ul style="list-style-type: none"> > Working conditions and corporate culture > Employee health and safety > Employee development > Diversity, inclusion and equal opportunities 	<ul style="list-style-type: none"> – Creating good working conditions and an inspiring corporate culture – Ensuring employee health and safety – Being more attractive as an employer to young people – Doing more in terms of diversity, inclusion and equal opportunities 	<p>We explain our objectives and measures for managing impacts in our “Employees” area of action in chapters GRI 3-3: Working conditions and corporate culture, GRI 3-3: Employee health and safety and GRI 3-3: Employee development.</p>

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TOPICS	STAKEHOLDER EXPECTATIONS AND FEEDBACK	OUR RESPONSES
<p>ENVIRONMENT</p> <ul style="list-style-type: none"> > Waste (input) > (Other) input materials/resources > Energy (output) > Climate-relevant emissions (output) > (Other) output materials/resources > Biodiversity and local ecosystems 	<ul style="list-style-type: none"> – Maintaining a transparent and responsible approach to dealing with output materials – Progress in decarbonisation and climate neutrality – Promote the protection of biodiversity and local ecosystems 	<p>We are transparent about our output materials (see GRI 305-1 to 305-4 ↙, GRI 305-7 ↙, GRI 306-3 to 306-5 ↙ and our input-output model ↙) and explain our objectives in this area (see GRI 3-3: Climate-relevant emissions ↙ and GRI 3-3: (Other) output materials/resources ↙). We explain how we aim to achieve our climate ambitions in chapter GRI 3-3: Climate-relevant emissions ↙. We want to manage all measures on the basis of a holistic climate protection concept in which we also want to integrate topics such as biodiversity and local ecosystems.</p>
<p>Value chain</p> <ul style="list-style-type: none"> > Customer relationships > (Direct) supplier relationships > Environmental impacts in the supply chain > Social impacts in the supply chain 	<ul style="list-style-type: none"> – Maintaining good relationships with suppliers and customers – Expand dialogues with strategic partners – Put greater focus on environmental and social impacts in the supply chain 	<p>We have a strategic objective of developing and maintaining good relationships with customers and partners. We regularly communicate with our stakeholders in various dialogue formats. These also include political representatives as well as members of the scientific and business communities and society (see GRI 3-3: Customer relationships ↙). Our Policy statement ↗ lays out our commitment to the respect of human rights and environment-related obligations. We implemented a risk management system in accordance with LkSG and appointed a Human Rights Officer. We want to use findings from the recurring and ad hoc risk analyses in our own business activities and in the immediate supply chain to derive remedial and preventive measures for potential and actual violations of due diligence obligations relating to human rights and the environment.</p>

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TOPICS	STAKEHOLDER EXPECTATIONS AND FEEDBACK	OUR RESPONSES
Society	<ul style="list-style-type: none"> > Provision of services, creation of jobs and payment of taxes > Participation in political and societal processes > Partnerships with scientific organisations > Involvement in the community 	<ul style="list-style-type: none"> – Strengthen positive impacts on communities and regional economy through job creation and tax payments – Uphold community involvement, dialogue and public relations as well as good neighbourly relations – Increase research on CO₂ capture and storage as well as take more action on waste avoidance, recycling and research relating to the circular economy – Take sustainability into account when participating in political and societal processes – Continue to adhere to democratically established laws
		<p>As part of the local communities, we take on responsibility for the economic, social and environmental development in the area – for example, by awarding contracts to local suppliers, providing future-proof, attractive employment and through regional environmental protection. We will continue to deepen our commitment to R&D and intensify our collaboration with universities and other scientific institutions (see GRI 3-3: Innovation ↙) with a view to protecting the climate/resources as well the circular economy. As a reliable company with industry know-how and a focus on sustainability, we contribute our expertise to the social policy discourse on the circular economy and the energy sector. Entries in the lobbying/transparency registers ensure there is public transparency regarding our involvement in political processes (see GRI 3-3: Participation in political and societal processes ↙). All EEW employees are equally obligated to comply with laws, policies and our Code of Conduct (see GRI 3-3: Ethics and integrity ↙).</p>

INTRODUCTION

GENERAL DISCLOSURES

SUSTAINABILITY STRATEGY

Area of action

COMPANY

Area of action

EMPLOYEES

Area of action

ENVIRONMENT

Area of action

VALUE CHAIN

Area of action

SOCIETY

STAKEHOLDER
ENGAGEMENT

→ Imprint

Imprint

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