



Sustainability Statement

2024

General Disclosures (ESRS 2)

Basis of preparation (BP-1 and BP-2)

The separate non-financial group report of SGL Carbon SE (hereinafter referred to as the “Sustainability Statement”) presents the corporate governance and performance of the company and its subsidiaries with regard to material sustainability topics, including detailed performance indicators (sustainability metrics). This Sustainability Statement for fiscal year 2024 (January 1, 2024 - December 31, 2024) constitutes the non-financial group statement of SGL Carbon pursuant to Sections 315b and 315c of the German Commercial Code (HGB) and was prepared in accordance with the European Sustainability Reporting Standards (ESRS, Delegated Regulation (EU) 2023/2772).

In this Sustainability Statement, we have not reported on the following eleven data points in accordance with the ESRS due to a lack of available data and/or what we consider to be inaccurate estimation methods. Our goal is to continuously improve the accuracy of the reported metrics and key figures.

Omitted data point(s)	ESRS
Number of cases of work-related ill health and associated days lost (2 data points)	Own workforce S1-14 para. 88d and e
Annual total remuneration ratio	Own workforce S1-16 para. 97b
Expected durability of the products in relation to the industry average	Ressource use & circular economy E4-5 para. 36a
CO ₂ Scope 3 targets	Climate change E1-4 para. 34a and b
Scope 3 CO ₂ reduction in absolute terms and intensity as a percentage of the base year (2 data points)	Climate change E1-4 para. 34a and b
Scope 3 CO ₂ emissions of selected categories (cat. 10 and 11) (2 data points)	Climate change E1-6 51 AR 46
Biogenic CO ₂ emissions related to scope 2 and 3 (two data points)	Climate change E1-6 AR 45e and AR 46j

The Sustainability Statement is not included in the Group Management Report (ESRS 1.110 and 112), but rather in a separate chapter of SGL Carbon's 2024 annual report.

The initial application of ESRS reflects the significance of these standards within the European sustainability reporting requirements. Furthermore, this statement contains all information required by Article 8 of the EU Taxonomy Regulation ((EU) No. 2020/852).

The following table shows a list of the material matters in accordance with §289c para. 2 in conjunction with §315c of the German Commercial Code (HGB) to the material ESRS topics identified by SGL Carbon in the context of the double materiality analysis.

Matters pursuant to section 289c HGB	Report sections ESRS topics	
Description of the business model	General disclosures	
Environmental matters	Climate change	material
	Recourse use and circular economy	material
Employee matters	Own workforce	material
Social matters	Social matters (affected communities) are reported voluntarily in accordance with ESRS 1.114.	
	Own workforce	material
Respect for human rights	Corporate Governance	material
	Corporate Governance	material
Combating corruption and bribery	Corporate Governance	material

According to our double materiality analysis, social matters are not a material concern for SGL Carbon. Due to the requirement resulting from Section 289c in conjunction with Section 315c of the German Commercial Code (HGB), the concept underlying this concern is addressed in this Sustainability Statement. No control-relevant key figures were available, i.e., most significant non-financial performance indicators within the meaning of Section 289c para. 3 in conjunction with Section 315c HGB.

This consolidated Sustainability Statement covers all fully consolidated entities of SGL Carbon SE, aligning with the scope of the company's consolidated financial statements for fiscal year 2024. You can find the complete list of these entities in the Notes to the 2024 Consolidated Financial Statements (ESRS 1.123). SGL Carbon SE has no controlled group

companies excluded from the scope of consolidation of the consolidated financial statements on materiality grounds.

No fully consolidated company of SGL Carbon is exempt from sustainability reporting. In addition, none of the fully consolidated companies exercises operational control over any company or assets outside the scope of consolidation. Strategies and policies generally apply to all included companies. The objectives and parameters presented in the Sustainability Statement also apply Group-wide. Only four sales offices (SGL CARBON Korea Ltd., SGL CARBON ASIA-PACIFIC SDN BHD, SGL Graphite Solutions Taiwan Ltd. and SGL CARBON Ltd. (Alcester, UK)) did not report consumption data according to ESRS E1 and E5 due to the immateriality of their consumption data for the entire SGL Carbon Group.

The purpose of sustainability reporting is to provide stakeholders and interested members of the public with a balanced view of relevant sustainability matters, commitments, practices, and results for fiscal year 2024. Consequently, this Sustainability Statement fully incorporates not only identified material sustainability-related impacts, risks, and opportunities from our own business processes but also those from our upstream and downstream value chains.

The greenhouse gas emissions data presented in this report refers to SGL Carbon and its fully consolidated subsidiaries, except for the three aforementioned sales companies. Greenhouse gas emissions from our upstream and partially downstream value chains are also included in the analysis. All other parameters presented in chapters E1, E5, S1, and G1 relate to our own business processes.

No use was made of the option to omit certain information relating to intellectual property and know-how.

The time horizons used in this Sustainability Statement correspond to those defined in the ESRS.

When using data on the upstream and/or downstream value chain, which are provided using indirect sources or approximate values, they are described in the disclosures to which they relate. This also applies to their basis, their degree of accuracy, and the possible measures to improve the accuracy of the data in the future.

Where quantitative data and key figures subject to a high degree of measurement inaccuracy are used, this is indicated in the information to which they refer. This also includes the assumptions and assessments that the creator has based these on. Furthermore, the sources for measurement uncertainties are indicated.

The following key figures are based on estimates and earnings uncertainties that SGL Carbon considers to be associated with the greatest uncertainty of determination and/or measurement accuracy. For a detailed description of the determination methods, please refer to the respective topic chapters.

ESRS	Key performance indicator	Determination approach
E1-6	Determination of Scope 3 Category 12	The emissions are based on internal expert estimates for determining volumes and regional OECD data on waste treatment.
E5-5	Resource outflows	Parts of the outflow volumes. Data gaps were closed by means of internal expert estimates.
S1-13	Training hours	No complete recording of training hours at all locations. SGL assumes that locations without recording have comparable training hours.
S1-16	Gender Pay Gap	Assumption of equal distribution worldwide based on data from Germany and the US.

The metrics are part of the Sustainability Statement, which as a whole is subject to the separate limited assurance engagement by the auditor. Beyond that, the metrics have not been validated by an external third party.

In individual cases, rounding may result in discrepancies between the values in this report and the totals given, and percentages may not add up exactly to the values shown.

This is the first Sustainability Statement by SGL Carbon to be prepared in accordance with the ESRS standards. Consequently, the company is not disclosing any changes in the preparation or presentation of the Sustainability Statement or any errors from previous periods. In the previous year, the Sustainability Report was prepared in accordance with the Global Reporting Initiative (GRI). The change in reporting standards was made due to the increasing importance of the ESRS standards and their expected future mandatory

application in the context of the implementation of the Corporate Sustainability Reporting Directive (CSRD) in Germany.

The information presented below has been incorporated by reference into this Sustainability Statement to avoid duplication within the 2024 Annual Report.

Integration of information by reference according to ESRS 1.119

Section	ESRS standard	Reference document
Integration of sustainability-related performance in incentive schemes	ESRS 2 GOV-3	Further details on the compensation of the Executive Board can be found in the 2024 compensation report.
Strategy and material impacts, risks and opportunities	ESRS 2 SBM-1	Description of the products and services in the Group's Business Model as part of the Group Management Report 2024
Strategy and material impacts, risks and opportunities	ESRS 2 SBM-1	Description of the market segments incl. sales split in the Group's Business Model as part of the Group Management Report 2024
Own workforce	S1 - ESRS 2 SBM 3	Group's Business Model as part of the Group Management Report 2024

Related information and links with financial statements in accordance with ESRS 1.123

Section	ESRS standard	Reference document
Basis for preparation	ESRS 2 BP-1	Description of the scope of consolidation as part of the Consolidated Financial Statements 2024

Additional information (unassured)

Section	ESRS standard	Reference document
The role of the administrative, management and supervisory bodies	ESRS 2 GOV-1	Information as well as responsibilities and competencies of the members of the supervisory board in the corporate statement / corporate governance rep
Procedure for assessing materiality	ESRS 2 IRO 1 and 2 (double materiality assessment)	Source regarding the involvement of external stakeholders: Intergovernmental Panel of Climate Change (IPCC WGI Interactive Atlas)
Information related to ESRS 2	E1	Source of climate scenarios used: Intergovernmental Panel on Climate Change (IPCC), Shared Socioeconomic Pathways (SSPs)
Targets related to climate change mitigation and adaptation	E1-4	Sources for determining climate-related risks: Intergovernmental Panel on Climate Change (IPCC WGI Interactive Atlas)

Governance (GOV-1 to 5)

Administrative, management and supervisory bodies (GOV-1 and GOV-2)

SGL Carbon SE, as a listed European company, follows a two-tier governance system. This means that the company's management and oversight functions are clearly separated. As of December 31, 2024, the Board of Management consisted of two independent members, and the Supervisory Board comprised eight members: four representing the shareholders and four representing the employees. The share of women on the Supervisory Board as of December 31, 2024, is 25%; the target is to achieve a rate of at least 30%. The share of male Supervisory Board members is 75%, resulting in a female-to-male ratio of 1:3. Other diversity criteria were only considered to the extent necessary for fulfilling the Supervisory Board's duties, such as qualification and experience.

The Chairman of the Supervisory Board also represents the company's largest shareholder. As a result, 87.5% of the board's members are considered independent under the German Corporate Governance Code. Further information about the roles and responsibilities of

both the Board of Management and the Supervisory Board can be found in the Corporate Governance Report (unassured) within this annual report.

With regard to the composition of the Board of Management, the Supervisory Board has established a specific requirements profile that emphasizes expertise and experience in environmental and climate issues, as well as social and governance matters. The Supervisory Board has adopted targets for its composition and drafted a skill set profile for the body as a whole. In accordance with the targets, it has set for itself, the Supervisory Board is to have a composition that ensures that its membership as a whole possesses the knowledge, skills and professional experience required to properly perform the duties of the Supervisory Board, including in connection with SGL Carbon's material impacts, risks and opportunities regarding sustainability matters.

All members of the Supervisory Board must be able to properly perform their duties. To properly perform the duties in the context of the company's accounting, at least two members of the Supervisory Board should have special knowledge and experience in the areas of accounting and auditing, including sustainability reporting (as financial experts); this is currently the case with Ms. Neumann and Mr. Denoke, as demonstrated by their training and education as well as their professional experience. As a qualified auditor and former partner of an audit firm, Ms. Neumann possesses the required knowledge and experience in auditing and accounting. As the Managing Director of a medium-sized enterprise, she also has sufficient experience regarding various sustainability and compliance matters as well as sustainability reporting. Mr. Denoke, as a long-standing CFO of a large listed company, has the necessary knowledge and experience in the application of accounting principles and internal control and risk management systems, along with knowledge and experience in the field of auditing and compliance. In addition, at least one member of the Supervisory Board must have considerable professional experience and industrial expertise in the SGL Carbon Group's sectors or key customer industries as well as the associated sustainability requirements of these stakeholder groups. Furthermore, each of the following areas should have at least one member who has extensive professional experience in the specified area: corporate management and corporate strategy, compliance and risk management, innovation expertise (including digitization), executive development and human resources. Moreover, the Supervisory Board should possess expertise in sustainability matters significant to the company, which is covered through the experience and professional background of all shareholder representatives.

The Audit Committee of the Supervisory Board oversees the preliminary audit of SGL Carbon SE's annual financial statements and the consolidated financial statements of SGL Carbon, including its sustainability reporting. The names of Supervisory Board members and committee compositions can be found in the company's Corporate Governance Report (unassured) and on the company's website. Within the Audit Committee, Ms. Ingeborg Neumann is the designated sustainability expert. The Audit Committee is also responsible for monitoring the risk management system, which integrates non-financial risks and opportunities. In addition to the Audit Committee, the full Supervisory Board regularly receives reports on current and potential impacts, risks and opportunities during its meetings. For further information, we refer to the Risk and Opportunities Report as part of the 2024 Group Management Report. A detailed description of the responsibilities and duties of Supervisory Board members and their competencies can be found in the Corporate Governance Report (unassured) of this Annual Report. In addition, the Board of Management of SGL Carbon is committed to the sustainability-related recommendations of the German Corporate Governance Code (DCGK).

The highest operational decision-making body of SGL Carbon is the Board of Management of SGL Carbon SE. The topics of climate and environmental protection, as well as human resources and compliance, are anchored at the highest operational decision-making level within the portfolio responsibility of CEO Dr. Torsten Derr (CEO during the reporting period). CFO Thomas Dippold is closely involved in environmental, sustainability and governance (ESG) matters through his responsibility for risk management and reporting. Both of them are supported in this area by an ESG Steering Committee made up of the heads of our four business units, the Corporate Sustainability Team and various experts in ESG-relevant areas.

The Board of Management meets with the ESG Steering Committee three times per fiscal year and receives updates from the Corporate Sustainability Team and subject matter experts on current ESG topics, progress toward targets and the development of material sustainability matters. The reporting also includes material impacts, risks and opportunities identified in the materiality analysis, the implementation of due diligence in sustainability and the results and effectiveness of adopted strategies, actions, targets and parameters. The composition of the ESG Steering Committee represents all relevant ESG topic areas, ensuring that the Board of Management is regularly informed about all material ESG topics. The ESG Steering Committee also monitors the achievement of targets, sets new

targets and defines actions for target achievement where necessary. In addition to the double materiality analysis, the focus in the reporting year was particularly on the requirements for preparing the Sustainability Statement originally in accordance with the CSRD. Moreover, additional regular discussions and meetings take place between subject matter experts and the Board of Management on human resources, energy management, occupational safety and compliance, where specific sustainability topics are addressed. Targets and actions for these sustainability matters are determined in the corresponding committees and councils, such as the health and safety (HSE) Council, the Compliance Committee or Energy Management, and reported to the Steering Committee.

The Supervisory Board also receives regular updates, at least once a year, from the respective department heads on material sustainability matters and associated impacts, risks and opportunities, and monitors strategy, actions and target achievement. During all its meetings in the reporting year, the Audit Committee, which is responsible for sustainability matters, was briefed by department representatives on the development of material ESG topics and reported on these topics to the full Supervisory Board.

A description of the expertise of the Board of Management and the Supervisory Board can be found in SGL Carbon's Corporate Governance Report (unassured). Regarding SGL Carbon's sustainability matters, the board members are informed about new developments by the respective internal subject matter experts, enabling them to update and expand their expertise. In addition, external experts such as consultants and auditors support board members in executing their mandate through training and information. A key focus of training conducted in 2024 was the implementation of the Corporate Sustainability Reporting Directive (CSRD).

As part of the risk management system, non-financial risks and opportunities are also a material component of reporting to the Board of Management and Supervisory Board. Appropriate actions are accordingly discussed and established to minimize risks and optimize opportunities.

As part of the double materiality analysis and risk management system, measures for reduction and minimization are defined for identified impacts and risks. The same applies to promoting opportunities. These actions may include internal policies and controls, as well as strategic corporate decisions and are presented to the committees where their effectiveness is discussed. As an example, we cite our strategy, actions and targets for

climate change mitigation. The transition plan for Scope 1 and 2 CO₂ emissions of SGL Carbon was presented to both committees and their approval was obtained. Both committees are also informed about the status of actions and target achievement and their approval is obtained for necessary adjustments when required. Actions approved in the past two years include, for example, the installation of solar systems in parts of our plants or the implementation of a biomass facility to replace a natural gas-operated facility at our site in Lavradio (Portugal).

The approach and results of the double materiality analysis and stakeholder survey were also presented to both the Board of Management and Supervisory Board as part of their reporting. In this context, all material impacts, risks and opportunities were discussed. These can be found in the following section IRO-1 and 2 of this Sustainability Statement. In addition, both committees were informed at least once a year about material developments in our sustainability metrics such as CO₂, waste, water, female representation, Lost Time Injury Frequency Rate (metric for accident rate with lost time) and compliance and personnel matters. Progress on target achievement was also part of the reporting.

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

Sustainability-related incentive schemes for the Board of Management are embedded in the short-term variable remuneration component (SGL Carbon Bonus Plan, STI). Incentives are set for the sustainable development of the Company via individual targets for the members of the Board of Management, with the Supervisory Board selecting at least one of the objectives from the topic areas of environment, social affairs/employees or governance/compliance.

The remuneration of the Supervisory Board does not include sustainability-related performance in incentive schemes. In accordance with the recommendation in the German Corporate Governance Code, the Supervisory Board receives fixed remuneration.

As individual targets for both Board of Management members for fiscal year 2024, in addition to achieving an accident rate (LTA = Lost Time Injury Frequency Rate) of <2.2, the further development of the ESG governance structure and the establishment of processes and structures for preparing the external ESG report and advancing sustainability reporting

were established. Climate-related considerations as targets were not included in the remuneration of the Board of Management or the Supervisory Board in 2024.

Achieving an accident rate of <2.2 was also established as a target for all other executives in management levels MG 2-5 for the short-term variable remuneration component (STI) and corresponds to 10% of variable remuneration.

For the Board of Management’s short-term variable remuneration (SGL Carbon Bonus Plan, STI), target achievement of individual goals is considered through a discretionary performance factor. This performance factor is designed as a multiplier of the STI remuneration amount resulting from the financial targets; the multiplier is set by the Supervisory Board depending on target achievement in a range between 0.7 and 1.3, meaning the share of the discretionary factor amounts to +/- 30% of the variable remuneration that would otherwise result. In this context, the Supervisory Board sets at least three targets within the discretionary factor, of which at least one target must result in sustainability parameters from the areas of environment, social affairs/employees or governance/compliance. The payout amount of the variable remuneration of the Board of Management is capped at 200% of the target bonus. According to the Board of Management remuneration system, the short-term variable remuneration should constitute a share between 18 and 26% of the target total remuneration of the Board of Management. Further information about Board of Management remuneration can be found in the 2024 Remuneration Report (audited).

The system of remuneration for members of the Board of Management is determined by the Supervisory Board and submitted to the Annual General Meeting for approval. The existing remuneration system was presented to the Annual General Meeting on May 9,

2023, and approved by a majority of 98.34%. The system for remuneration of Supervisory Board members is determined by the Annual General Meeting. The existing remuneration system was presented to the Annual General Meeting on May 9, 2023, and approved by a majority of 99.90%. The remuneration systems are regularly reviewed and must be submitted to the Annual General Meeting for approval in accordance with statutory requirements whenever there are material changes, but at least every four years. Further details can be found in the 2024 Remuneration Report (audited) on our website.

Statement on due diligence (GOV-4)

As an energy-intensive, internationally operating manufacturing company and employer in many regions with a global supplier network, SGL Carbon acknowledges its responsibility and due diligence obligations for the environment and climate, safety, health and well-being of its own employees, respect for human rights and responsible supply chains, and it has embedded these in its corporate strategy. We communicate our efforts and progress in continuously improving our sustainability performance through internal and external communication channels. We report on our sustainability development in internal committees, our intranet and social media channels and on our webpage. We prepare an annual Sustainability Statement and summarize our measurable metrics in our ESG factsheet. We also participate in various active and passive ratings, and so making our sustainability performance comparable. The following table provides an overview of the core elements of our due diligence and their presentation in this Sustainability Statement.

Core elements of due diligence

Integration of due diligence into governance, strategy and business model
Engagement of affected stakeholders in all important due diligence steps
Identification and assessment of adverse impacts
Actions against these adverse impacts
Tracking the effectiveness of these efforts and communication

Sections in the Sustainability Statement

ESRS 2 GOV-2; ESRS GOV-3; ESRS SBM-3 and the topical chapters E1 and E5, as well as S1 and G1
ESRS 2 GOV-2; ESRS 2 SBM-2; ESRS 2 IRO-1 and in the topical chapters E1 and E5, as well as S1 and G1 (ESRS MDR-P)
ESRS 2 GOV-2; ESRS 2 IRO-1; ESRS 2 SBM-3
ESRS 2 MDR-A topical chapters E1 and E5, as well as S1 and G1 (Actions)
ESRS 2 MDR-M and MDR-T topical chapters E1 and E5, as well as S1 and G1 (Parameters and Targets)

Risk management and internal controls over sustainability reporting (GOV-5)

SGL Carbon's risk management system also records sustainability risks and opportunities to which the company is exposed. In addition to the non-financial internal control system (ICS) introduced in 2024 and compliance management, risk management is an integral component of corporate governance at SGL Carbon. The non-financial internal control system aims to minimize risks in operational business processes, e.g., in the collection, validation and consolidation of sustainability-related values and parameters through implementation of appropriate controls. The risk management system is also used to identify and assess sustainability-related risks and opportunities. The compliance management system deals with processes and actions to ensure compliance with legal provisions and internal policies regarding the company's sustainability matters.

The chief financial officer is responsible for the adequacy and effectiveness of the risk management system. Organizationally, the Board of Management is supported by Group Controlling, which coordinates the risk management process, including in sustainability matters, at Group level.

In addition to the double materiality analysis, the risk owners conduct an annual risk assessment. This also includes risks from non-financial matters such as environmental and climate, social and governance (ESG) issues as well as risks associated with preparing the sustainability report. Actions to counteract identified risks are specified. The risk assessment is then updated on a quarterly basis. Material new risks or risks that threaten the company as a going concern are immediately reported to the Board of Management and to the Supervisory Board, as appropriate, via ad hoc reporting, regardless of the defined reporting intervals.

The assessment of risks and opportunities regarding SGL Carbon's sustainability matters was conducted as part of the materiality analysis according to ESRS (see also the section "Strategy and material impacts, risks and opportunities" ESRS 2 IRO-1) and is incorporated into our group-wide risk management system to ensure integration of sustainability risks and opportunities into the company's risk management system. The assessment considered the financial effects and likelihood of occurrence for all identified risks and opportunities. The assessment of our sustainability risks and opportunities is based on the classification criteria of our group-wide risk management system.

Further information on SGL Carbon's group-wide risk management system and the method for prioritizing risks and opportunities according to the SGL-wide classification system can be found in the Opportunities and Risks Report in the Group Management Report.

In the Group's Opportunities and Risks Report, we have also presented our key sustainability risks and mitigation strategies. We also refer to the reportable topic standards of this Sustainability Statement (see also the section "Strategy and material impacts, risks and opportunities" ESRS 2 SBM 3), which provide detailed presentations of material risks and opportunities as well as actions to minimize risks and optimize opportunities.

Risks may result from the preparation of the Sustainability Statement. Data collection, validation and consolidation of reportable sustainability data may involve risks, as may the lack of data availability and associated inaccuracies in estimation procedures. Errors in manual processes required as part of reporting processes, e.g., to merge data from multiple systems, may also pose risks. To minimize these risks, SGL Carbon implemented a non-financial internal control system (nf ICS) during the reporting period. It defines responsibilities for data collection, aggregation, validation and control.

Data is collected at the level of local subject matter experts and largely entered into IT-supported systems, which verify data completeness through system checks. This process is monitored by ESG reporting specialists from the central Group Accounting department. The completeness and accuracy of entries are further confirmed through a dual-control principle at the local department level by the respective site manager. Content validation of the data is performed centrally by higher-level departments before the data is systematically consolidated. The verification of proper data transfer into the Sustainability Statement is performed centrally by the Corporate Sustainability Team.

Data whose entry and consolidation is not yet performed in IT-supported systems, e.g., the number of reports from the whistleblower system, is collected centrally and controlled through a dual-control principle. The verification of proper data transfer into the Sustainability Statement is also performed centrally by the Corporate Sustainability Team.

As previously described, central Group Controlling is responsible for the risk management system and reports quarterly and, if necessary, ad hoc to the Board of Management. The risk management system is monitored by the Supervisory Board via the Audit Committee. The adequacy and effectiveness of the non-financial internal control system (ICS)

introduced during the reporting year is the responsibility of the Chief Financial Officer, who is supported in this by the Group Accounting and Corporate Sustainability departments. During the reporting period, the full Board of Management was informed about the progress and effectiveness of the non-financial internal control system in the meetings of the ESG Steering Committee. The Audit Committee of the Supervisory Board was also briefed about the non-financial ICS in its meetings and reported on it to the full Supervisory Board.

Strategy and material impacts, risks and opportunities (SBM-1 to 3)

Strategy, business model and value chain (SBM-1)

To avoid duplication of information in the Sustainability Statement and the Group Management Report, we refer pursuant to ESRS 1.119 to the following parts of the Group Management Report: The description of significant product groups and services, as well as markets and customer groups (ESRS SBM 1 para. 40 a) i. and ii.) is provided in the chapter “Group business model” in the 2024 Group Management Report. The number of employees by geographical area (ESRS 2 para. 40 a) iii. and SBM 1 para. 40a) i. and ii.) can be found in the chapter “Own workforce – S1-6” of this Sustainability Statement.

From SGL Carbon’s perspective, sustainable operations and business practices are key prerequisites for remaining competitive today and in the future. Our mission is to grow profitably and positively shape the future by developing high-quality and innovative carbon-based products – for all industries and areas of life. With its materials, products and services, SGL Carbon is already serving markets that are helping shape the future trends of environmental and climate protection as well as digitization. We therefore focus on future markets that support these trends and offer corresponding growth opportunities: mobility (including electromobility and fuel cell vehicles), renewable energy industries (solar, wind energy) and the semiconductor industry. These are our most important markets. We will concentrate on them and participate in their growth in the future. No changes occurred in our significant markets during the reporting period. A detailed presentation of our products and markets as well as a revenue split of significant market segments can be found in the

chapter “Group fundamentals” of the 2024 Group Management Report (ESRS 1.119). With our 4,511 employees, we strive to offer products that contribute to greater sustainability, but we also want to ensure that our manufacturing and management processes and our supply chains meet ambitious environmental, social and corporate governance standards.

In addition to complying with all legal provisions, we aim to further reduce negative impacts on the environment and society, particularly regarding our identified material sustainability matters. We want to leverage opportunities and positive sustainability effects of our activities while minimizing risks through targeted actions. In doing so, we also align ourselves with the United Nations’ Sustainable Development Goals (SDGs).

SGL Carbon’s sustainability goals do not relate to specific product groups, customer categories, geographical areas and/or stakeholder relationships. Our sustainability goals are global group goals. Through our product portfolio and market focus, we strive to contribute to climate change mitigation and optimally leverage associated opportunities. As an energy-intensive company, we are working to reduce our own energy consumption, increasingly use renewable forms of energy and thereby lower our CO₂ emissions.

In addition, we want to promote efficient use of our required resources and the circularity of our products. This includes reducing water consumption, reintegrating production waste into the manufacturing process and avoiding waste wherever possible. To improve the recyclability and reusability of our products, we are conducting research together with associations and scientific institutions on alternative and renewable raw materials and new technological processes.

Through our personnel strategy and associated actions such as performance-based compensation, equal treatment and diversity, training and development opportunities, and open dialogue with our employees and their representatives, we aim to be an attractive employer. This improves our opportunities in the labor market and minimizes risks, e.g., due to demographic change or skilled worker shortages. One of our targets is to achieve a share of women in senior management (one level below the Board of Management) of at least 20%, to increasingly become an attractive employer for female professionals.

Health protection and occupational safety are essential components of our corporate strategy and are anchored in our Code of Conduct. Accordingly, we aim to improve our LTI

Frequency Rate by at least 5% each year (base year 2022) to achieve our long-term objective of zero accidents.

The commitment to respect human rights in our own activities and throughout our entire value chain serves the goal of reducing negative impacts on society.

Strict compliance with laws, standards and guidelines combined with structured processes, practices and controls are essential factors in our corporate policy and an integral part of our corporate strategy. This includes a corporate culture based on our values and consideration of internal and external stakeholder groups along our value chain.

One goal is to manifest our values within the company and continuously improve our performance culture. Our suppliers must also measure up to our sustainability standards. Accordingly, it is our goal that all relevant suppliers accept our Business Partner Code of Conduct by signature. In fiscal year 2024, 99% of our relevant suppliers signed the Business Partner Code of Conduct (further information can be found in section G1-2).

Our governance and corporate culture should help reduce negative impacts on the environment and society, strengthen positive impacts, minimize risks and optimize opportunities (detailed explanations can be found in the chapter "Governance – G1-1" of this Sustainability Statement).

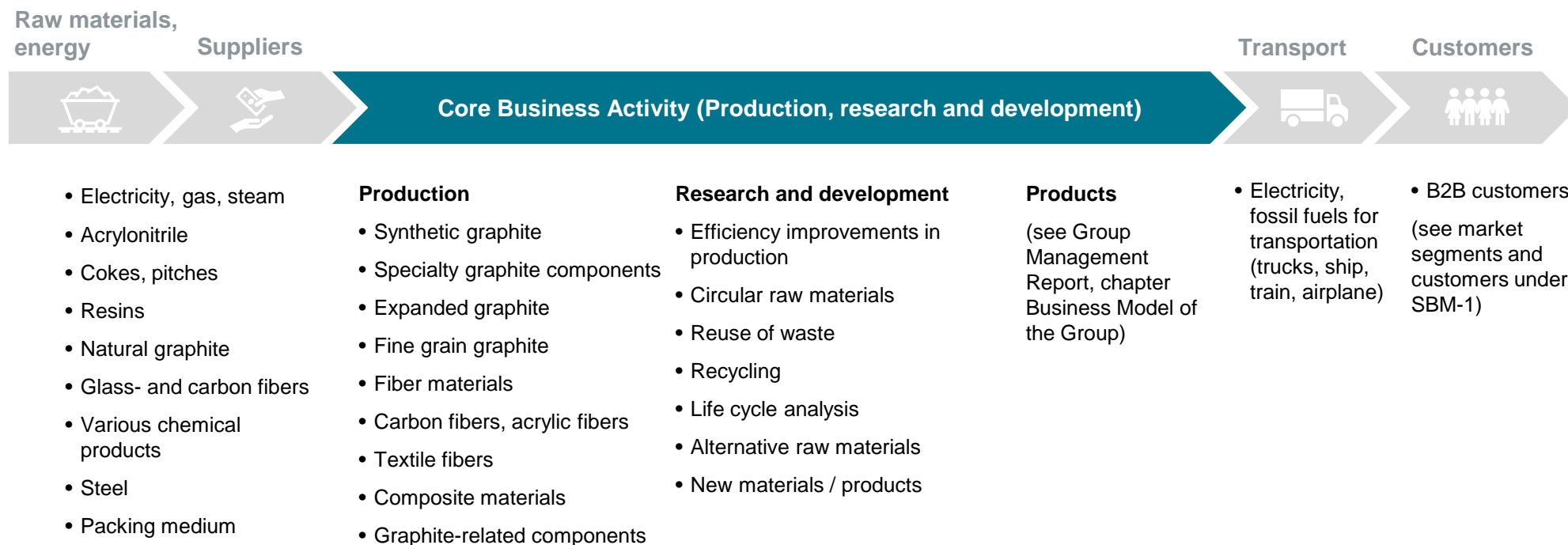
Value chain

SGL Carbon manufactures carbon-based materials and products for various applications and customer groups while striving to offer customers products and solutions that contribute to greater sustainability.

To manufacture our materials and products, we need raw materials that we source through a global supplier portfolio. Our suppliers are required to accept the Business Partner Code of Conduct and to regularly report on selected ESG aspects via an online questionnaire (chapter "Governance – G1-2"). These also include legal compliance and respect for labor and human rights (please also see the chapter "Own workforce"). Further information about relationships with our suppliers can also be found in the chapter "Governance – G1-2". Important suppliers to SGL Carbon are companies from which we source our main raw materials: acrylonitrile, pitch, coke, precursor and energy.

Our products are manufactured at 29 production sites in Europe, North America, China and Japan and sold to customers worldwide. The description of significant product groups and services as well as markets and customer groups (ESRS 2 SBM 1 para. 40 f) and g) is provided in the chapter "Group business model" of the Group Management Report 2024 (ESRS 1.119). Our goal of delivering quality, innovative and customer-oriented products is complemented by our responsibility for safety in the manufacturing, storage and transport of these products. We support our customers, warehouse operators and transporters in the safe and environmentally friendly handling of our products. One example is our product-specific safety data sheets.

A schematic representation of our value chain with the essential input and output parameters can be found in the following graphics.



Our stakeholders (SBM-2)

Engaging with stakeholders helps us understand which sustainability matters related to SGL Carbon are important to them, what they expect from us and how we can resolve common challenges together. We maintain regular exchanges with our stakeholders to identify, assess and manage significant social, environmental and economic impacts of our activities and business relationships. Stakeholder dialogue flows into action plans for addressing the impacts of SGL Carbon.

Relevant stakeholders for SGL Carbon are institutions or persons with whom we have a direct (e.g. employees) or indirect (e.g. suppliers, customers, investors) relationship through our business activities and who therefore have an interest in our actions. Important stakeholder groups include our employees, customers, suppliers and other business partners as well as shareholders, banks, financiers and insurers. Our important stakeholders also include our neighbors at our sites, employee representatives, professional and sustainability associations and scientists, as well as public authorities and the media.

Regular stakeholder engagement occurs at the corporate level, in business units and at SGL site level through supplier and customer discussions, bilateral exchanges with individual

stakeholder groups, stakeholder meetings and through industry associations. Constant exchange with our employees, such as through the annual employee survey and with union or employee representatives, is just as much a part of our stakeholder engagement as are discussions with affected communities and interested members of the public.

In fiscal year 2023, in addition to our regular discussions, we reviewed the various internal and external stakeholder groups along our value chain, incorporating ESRS standards, and surveyed them through an online questionnaire. Representatives of our stakeholder groups were asked to provide their assessment of the impacts of SGL Carbon's business activities on the company's potentially material sustainability matters. We particularly focused on sustainability matters identified through our materiality analysis. The relevance of the topics was rated on a scale from 1 (no relevance) to 5 (severe). The evaluation was performed by ranking the sustainability topics according to relevance. It confirmed the material sustainability topics identified in our materiality analysis for SGL Carbon.

An example of incorporating stakeholder interests is the decision to develop and manufacture carbon fiber with reduced CO₂ emissions. For this purpose, a biomass plant was installed at the Lavradio site (Portugal), which is intended to partially or fully replace steam generation through gas in the future. With the complete substitution of gas with biomass, up to 40 kilotons of CO₂ can be saved. This not only reduces our own carbon footprint and makes a positive contribution to climate change mitigation but also enables our customers to reduce their Scope 3 emissions.

Regular exchange with our stakeholders enables us to review and, if necessary, adjust our sustainability ambitions and the related business model. We have recognized the increasing importance of resource use and product circularity and are working with various institutions to improve, for example, the recyclability of composite materials in the medium term. We expect initial results from a research project (recycloPreg), which started in November 2024 and has a three-year duration. Further information can be found in the chapter "Resource use and circular economy – E5."

Through direct dialog with our stakeholders, e.g., in supplier and customer discussions, at investor conferences, through exchanges with our workforce and their representatives, as well as regular stakeholder surveys as part of our double materiality analysis (which is planned for 2025), we want to continue accounting for their interests and incorporation into our business model in the future.

Significant insights from stakeholder discussions regarding SGL Carbon's impacts are discussed with the Board of Management and Supervisory Board, and the results from the stakeholder survey were presented in detail.

Material impacts, risks and opportunities (SBM-3)

Based on the results of our materiality analysis, SGL Carbon has identified material impacts, risks and opportunities that arise from our business activities and organization, as well as our upstream and downstream value chain or affect these.

Environment and climate

SGL Carbon uses various raw materials such as acrylonitrile, pitch and coke to manufacture its products. The CO₂ emissions associated with the production of these raw materials are attributed to SGL Carbon as Scope 3 emissions. More than half of our carbon footprint during the reporting period comes from our upstream value chain. The manufacture and processing of our products is energy-intensive, meaning that CO₂ is also released through our own processes and procedures (Scope 1 and 2 emissions).

SGL Carbon's materials and products are largely based on non-renewable raw materials, whose consumption could have negative impacts on the environment. Moreover, the limited reusability of our products can also have negative impacts.

To reduce our carbon footprint and achieve more efficient material use and waste prevention, we have developed strategies and actions and set ourselves targets (see also the chapters "Climate Change – E1" and "Resource use and the circular economy – E5"). We are also increasingly focusing on manufacturing products and supplying market segments that make a positive contribution to climate change mitigation.

Due to our business model, production processes, as well as our required raw materials and associated CO₂ emissions, we have identified both significant negative and positive impacts on the environment and climate. Our carbon footprint poses risks for our company on the one hand, while opportunities arise through the expansion of sustainable market segments on the other.

An overview of material impacts, risks and opportunities related to climate change, as well as resource use and circular economy, their location in the value chain and expected time horizons, can be found in the following table:

Climate change (E1)

Topic	IRO	Name	Description	Value chain/ time horizon
Climate change	Negative impacts (actual)	Increasing greenhouse gas emissions (production)	We need energy, including from fossil fuels, to manufacture our products. The associated greenhouse gas emissions have negative impacts on climate change and/or can cause extreme weather events, health problems, ocean acidification and water scarcity. This may result in economic costs and excessive damage to people and the environment. SGL Carbon has set itself short-, medium- and long-term targets for CO ₂ reduction (Scope 1 and 2) to reduce these negative impacts.	Own operations/ medium-term
Climate change	Positive impacts (potential)	Reduced greenhouse gas emissions (production)	The long-term goal of reducing CO ₂ emissions in our production processes through increased efficiency, the use of renewable energy and other measures will have a positive impact on the environment and climate.	Own operations/ long-term
Climate change	Positive impacts (potential)	Reduced greenhouse gas emissions (value chain)	The increasing focus on products (e.g., CO ₂ -reduced carbon fibers, battery boxes, graphite brushes) and markets (e.g., electromobility, wind and solar industries, LED applications) that promote climate change mitigation will result in reduced CO ₂ emissions in our downstream value chain. This will have positive impacts on the environment, climate and society.	Downstream value chain/short-term
Climate change	Risk	Higher prices for greenhouse gas emissions	Regulators may respond to the increasing impacts of climate change by making amendments to the legal framework that lead to price increases for greenhouse gas emissions and/or stricter regulations, which in turn may be associated with higher costs for SGL Carbon. Higher prices for greenhouse gas emissions and/or new regulations carry a financial risk for SGL Carbon.	Own operations/ medium- to long-term
Climate change	Opportunity	Innovation and development	The development of low-carbon materials and products may improve SGL Carbon's competitive position. We may also benefit in the long term from changing consumer and customer preferences for more sustainable products. Hence, we are investing in research and development, new processes and equipment with the intention of reducing the carbon footprint of our products.	Own operations/ long-term
Climate change	Opportunity	Bigger market for low-carbon products	Environmental awareness is growing among consumers, and therefore our customers, as well. There is an increasing probability of a preference for products and services that are kind to the environment and climate. This means there is an opportunity for SGL Carbon to achieve revenue exceeding expectations in our focus markets, such as the wind industry and electromobility, on account of growth there.	Own operations/ long-term
Energy	Negative impacts (actual)	Energy from fossil fuels	In our manufacturing, we also use fossil fuels that produce carbon emissions and contribute to climate change and global warming, which are associated with extreme weather events, health problems, economic costs and excessive damage to people and the environment.	Own operations/ medium-term

Resource use and circular economy (E5)

Topic	IRO	Name	Description	Value chain/ time horizon
Resource inflows	Negative impacts (actual)	Use of non-renewable raw materials	We also need non-renewable raw materials to manufacture our products. These have negative impacts on the environment. The use of these raw materials can lead to limited availability and, in the long term, to the depletion of resources and to environmental damage. To avoid these impacts, we are striving for alternatives in the long term.	Upstream value chain and own operations/short-term
Resource outflows	Negative impacts (actual)	Non-reusable waste	The downstream non-recyclable waste or insufficient reusability of some of our products at the end of their life cycle leads to increased waste, which has negative impacts on the environment and climate. We are therefore also working on technical solutions for the reusability of our products. The aim is to reduce the negative impacts of waste materials at the end of their life cycle.	Downstream value chain/short-term
Waste	Negative impacts (actual)	Material efficiency	Inefficient use of raw and other materials in our production processes may lead to increased consumption and, in the long term, to the depletion of resources and to environmental damage. This has negative impacts on people and the environment. As such, we are endeavoring to use materials more efficiently and to reduce production waste as well as, where possible, reuse it within the manufacturing process.	Own operations/short-term

Own workforce (S1)

The success of SGL Carbon is also based on the performance, commitment and cooperation of the workforce. We believe that a corporate culture characterized by respect and appreciation, as well as responsibility, honesty and trust, combined with fair and good working conditions, can have positive impacts on society. In line with our values, we respect

and uphold human rights. Employee surveys, training and development measures, safe and healthy work practices, as well as fair and performance-based compensation are anchored in our corporate strategy to sustainably promote and ensure positive impacts on society (see also the chapter “Own workforce – S1”). The impacts on society that we have identified can be found in the following table:

Topic	IRO	Name	Description	Value chain/ time horizon
Working conditions	Positive impact (actual)	Increased public well-being	SGL Carbon strives to positively impact public well-being through its working conditions and a good corporate culture by promoting employee satisfaction, productivity and ethical practices. Specific actions include flexible working time, comprehensive training and development offerings, and high standards of occupational health and safety. We also place the highest importance on respecting and upholding human rights.	Own operations/ short-term
Working conditions	Positive impact (actual)	Increased prosperity	Fair pay and good working conditions can lead to higher productivity and employee retention, a better reputation, and a safer working environment, all of which can contribute to employee satisfaction. The company retirement benefit plan and a high percentage of collective agreements can also contribute to the development of prosperity of both one's own workforce and society.	Own operations/ short-term
Equal treatment for all	Positive impact (actual)	Economic growth	In addition to pursuing profitable and sustainable growth, SGL Carbon takes targeted action to foster the prosperity of its own workforce and society through targeted measures. Training and development programs, along with talent management, help improve the skills of its workforce, thereby contributing to long-term economic growth.	Own operations/ short-term

Business conduct (G1)

Corporate policy and culture, our actions and business practices likewise harbor opportunities and risks and can have positive and negative impacts on the environment and society. As part of our materiality analysis, we have identified the following material impacts:

Topic	IRO	Name	Description	Value chain/ time horizon
Business practices	Negative impacts (potential)	Export controls (dual-use)	Some of our products are what are known as dual-use items. These are technologies or goods that have both civil and military applications and are subject to specific export controls. These controls are intended to prevent misuse for harmful purposes and to strike a balance between innovation and security. This has an impact on society, in that potential risks are managed while ensuring technological progress.	Own operations/ short-term
Corruption and bribery	Positive impact (actual)	Societal safety, well-being and fair treatment	Companies can play a role in improving societal safety, wellbeing and fair treatment by ensuring compliance with applicable laws, standards and guidelines. This includes ethics compliance and measures combating fraud, corruption and unethical conduct. The SGL Carbon Code of Conduct not only reflects our values, but also lays down rules of conduct for our entire workforce. It is supplemented by topic-specific policies, instructions and process manuals.	Own operations/ short-term

Some of our products can be used for civilian and military applications, which could have negative impacts on the environment and on society. To prevent misuse, we commit to complying with applicable laws and have implemented controls for the sale and export of these products. Legally compliant and ethical conduct builds societal trust in companies and institutions. In our Code of Conduct, which is binding for all SGL Carbon employees, we have formulated our values, standards and rules of conduct. This also includes our clear commitment not to tolerate corruption and bribery or unethical conduct in any form (see also chapter “Governance – G1”).

The financial impacts of our material risks and opportunities may be reflected in our financial position, financial performance and cash flow. Material risks and opportunities above the materiality threshold were identified exclusively for the ESRS standard E1 (climate change). Financial impacts for fiscal year 2025 could result from higher expenses due to potential price increases for greenhouse gas emissions and/or the tightening of greenhouse gas-related regulations. The procurement of renewable energy also continues to be associated with higher expenses for SGL Carbon. The potential higher expenses mentioned may be associated with cash outflows and may thus negatively impact SGL Carbon’s cash flow.

The materiality analysis has shown that SGL Carbon’s business activities along our upstream and downstream value chain have significant positive and negative impacts on the environment and society. In addition, these business activities harbor risks and opportunities for SGL Carbon. SGL Carbon has developed strategies to reduce negative impacts, promote positive impacts and minimize risks, as well as leverage our opportunities. These strategies and associated actions are intended to strengthen the resilience of our business model and regulate our impacts on the environment and society.

To improve our resilience regarding our sustainability matters, we have implemented various processes and structures.

- The monitoring of defined actions for regulating the material impacts, risks and opportunities identified in the double materiality analysis are intended to verify their effectiveness. For this, we primarily use measurable metrics such as energy consumption, CO₂ emissions, waste volume or the proportion of women in management and the number of lost days due to work-related accidents. If measures do not achieve the desired targets, adjustments are made and/or supplementary

actions are defined. Details on the strategy and actions for regulating material impacts, risks and opportunities can be found in the topic chapters “Climate change – E1,” “Resource use and circular economy – E5,” “Own workforce – S1” and “Business conduct – G1.”

- Through direct dialog with our stakeholders, e.g., in supplier and customer discussions, at investor conferences and through exchanges with our workforce and their representatives, as well as regular stakeholder surveys as part of our double materiality analysis, we want to continue to incorporate their interests into our business model in the future and so ensure the resilience of our business model. (For more information, see also the chapter “Our stakeholders” – SBM-2.)
- Regular reports on the effectiveness of actions, development of metrics, new insights about stakeholder requirements and regulatory developments are provided to sustainability committees such as the ESG Steering or Compliance Committee at least once a year (please see also chapter “Governance” GOV 1 and 2).
- In addition, as part of our opportunities and risk management system, risks and opportunities from our sustainability matters are regularly analyzed and evaluated and actions for risk minimization and opportunity utilization are developed. A detailed presentation of our opportunity and risk management system and the assessment of our opportunities and risks can be found in the Opportunities and Risks Report in our Group Management Report (see also chapter “Governance” GOV 5).
- For an analysis of our business model in the context of climate change, please refer to chapter “Climate change” – E1.

We have identified material risks resulting from sustainability matters that affect our business model and qualitatively analyzed their effects on our business model. Based on the processes, structures and actions described and the information currently available, we believe that no significant individual risks related to sustainability topics exist – neither now nor in the foreseeable future – that could jeopardize the company as a going concern. Regarding the time horizons of climate risks, we refer to the presentation of the climate

scenario analysis in the chapter “Climate change”– E1. Even the cumulative consideration of the individual risks does not jeopardize the continued existence of SGL Carbon as a going concern. Thanks to our regionally diversified setup, increased use of renewable energies, and the ability to adapt manufacturing processes in a climate-friendly manner, we consider SGL Carbon’s business model to be sufficiently resilient. Ultimately, however, residual risks remain in all entrepreneurial activities and cannot be ruled out even by conducting a comprehensive analysis of resilience.

Since this is the first year our Sustainability Statement has been prepared in accordance with the European Sustainability Reporting Standards (ESRS), no changes have been made to the disclosure of material impacts, risks and opportunities. Accordingly, there have been no changes in material impacts, risks and opportunities compared to the previous reporting period. Although there have been no changes in material impacts, risks and opportunities, we have decided to report continuously and voluntarily on a series of datapoints to ensure long-term consistency in our reporting. In that sense, SGL Carbon has decided to disclose information on a series of datapoints that are not material and therefore not required to be disclosed. This voluntary information is marked as ESRS 1.114.

Disclosures on the materiality assessment process (IRO-1 and 2)

Double materiality analysis

As part of our preparations for sustainability reporting in accordance with the Corporate Sustainability Reporting Directive (CSRD), we conducted a materiality analysis in accordance with the European Sustainability Standards (ESRS). In the analysis, we considered the principle of double materiality and accordingly examined it from two central perspectives:

- **Environmental and social impact materiality** (inside-out perspective – “Impacts”): Consideration of the impacts of SGL Carbon’s business on the environment and society. This analyzes the impact of the company’s activities on various interest groups and stakeholders (including the stakeholder “Nature”).

- **Financial materiality** (outside-in perspective – “risks and opportunities”): Consideration of the influence of environmental and social factors on SGL Carbon. The risks and opportunities arising from external developments that could potentially have a financial impact on the company are examined.

Material impacts, risks and opportunities of the relevant sustainability matters were identified based on a collection of topics drawing on various sources and topical workshops, supplemented by qualitative and quantitative expert assessments. A detailed overview of our material and non-material ESRS topics is presented in the chapter “Material impacts, risks and opportunities” – SBM-3. The impacts, risks and opportunities arising from SGL Carbon’s business model were identified and assessed along our upstream and downstream value chains. A simplified form of our value chain can also be found in the chapter SBM-1.

The objective of our materiality analysis is to identify, assess, prioritize and monitor SGL Carbon’s potential and actual impacts on people and the environment. To determine the material impacts, we applied the following approach:

1. Development of a list of possible sustainability matters

In the first step, a comprehensive list of potentially material topics was created based on a desktop analysis, which corresponds to a collection of topics based on different sources. In addition to the standards applied (ESRS), the desktop analysis also included ESG topics relevant to our industry sector and competitive analysis. Current trends and developments were included through, among other things, possible future legislative initiatives and focus topics of NGOs that could affect our sites, including the Deforestation Regulation, the Energy Efficiency Act and the Corporate Sustainability Due Diligence Directive. The results of previous materiality analyses, topics and areas of interest from various sustainability ratings, such as MSCI ESG, ISS ESG (Institutional Shareholder Service ESG) and Sustainalytics, as well as other stakeholder groups, such as investors, industry and professional associations, were also included in the topic collection. While compiling our initial list of sustainability matters, we eliminated any duplicate topics that came up during our research. We also excluded topics that were not relevant to SGL Carbon’s business activities, such as animal testing. The exclusion of non-relevant ESG issues is based on our own assessment, which is guided by the basic principle of dual materiality, i.e. the analysis of potential impacts of the business

model of SGL on the environment and society (inside-out perspective) and potential financial opportunities and risks for SGL Carbon (outside-in perspective).

2. Stakeholder survey

In addition to our regular stakeholder engagement (for more details, see the chapter “Our stakeholders” — SBM 2), we conducted an online survey in the summer of 2023 reaching out to our key stakeholders, including employees, corporate bodies, suppliers, customers, industry associations, investors and banks. The survey built on our preliminary list of sustainability matters (see step 1) and helped ensure that stakeholder perspectives informed our materiality analysis. We incorporated the feedback and insights gathered from this survey into the assessment phase during our expert workshops in step 3, which confirmed that we had correctly identified our key topics.

The survey helped us gather perspectives and assessments from different stakeholder groups, providing valuable input for our assessment workshops. We placed particular emphasis on identifying and addressing potential blind spots. During the validation phase, we revisited the survey results to ensure our final assessments aligned with stakeholder perspectives. Rather than simply using the results as a source of information, we integrated them into our final assessments. We also considered the interests of “silent stakeholders” through studies and publicly available information, drawing on expert knowledge, external sources, and digital tools such as the “IPCC WGI Interactive Atlas” (unassured).

3. Expert workshops for impact assessment

We conducted interactive expert workshops focused on specific topics to comprehensively evaluate and validate the impacts, risks and opportunities for all items from our initial sustainability matters list (see step 1). SGL specialists from various business units contributed their expertise to assess the actual and potential impacts of SGL Carbon’s business model on the environment and society, following ESRS guidelines and categories.

During these topic-specific workshops, our internal experts identified and evaluated additional impacts, adding them to our list of material impacts, risks and opportunities. This process allowed us to incorporate any previously overlooked aspects from the

preliminary selection. In total, we identified and assessed 94 impacts, risks and opportunities across all sustainability matters, with 18 of these emerging as material.

4. Validation of the results by the Board of Management

In a dedicated workshop, we presented the preliminary results from Steps 1–3 and the material topics identified to the Board of Management, our highest decision-making body, for validation and confirmation. This feedback ensured that our results aligned with SGL Carbon’s corporate strategy, objectives, policies and culture. The Board of Management confirmed:

- a. The validation of the ESG topics that are material for SGL Carbon in accordance with the Corporate Sustainability Reporting Directive (CSRD)
- b. The selection of topics that the company intends to report voluntarily (ESRS 1.114). These are ESG topics that are not material for SGL Carbon according to the CSRD and are therefore not subject to reporting requirements, but which may be of interest to individual stakeholders of the company,
- c. and the topics identified as immaterial for SGL Carbon in terms of the CSRD were confirmed.

5. Software-based finalization of the materiality assessment

After manual analysis and validation by the Board of Management, we transferred our materiality assessment into an online software platform. This step served two purposes: creating visual representations of our results and establishing a documentation foundation for updating our double materiality analysis in future fiscal years. Through this process, we identified seven impacts as material.

Our double materiality analysis took a comprehensive view of SGL Carbon’s activities, examining our business operations, including production processes, business relationships, and our entire upstream and downstream value chains. While the analysis covers our global activities and business relationships, we paid particular attention to factors that could lead to increased risks of negative impacts. These factors particularly relate to the use of raw materials, our product manufacturing processes including emissions, transport and

logistics, as well as the use of our products across various applications and industries. We specifically examined the energy intensity of our manufacturing processes and the circularity potential of our products. We also considered working conditions, occupational safety and health, diversity and equal opportunity, and impacts and risks related to human rights. Additionally, we examined compliance with all legal requirements and relationships with our international suppliers and business partners. As a global technology company with sites in different regions and as a company engaged in manufacturing carbon-based solutions, these factors are significant for our business model and value chain. The comprehensive analysis enabled us to identify and assess potential impacts with elevated risk along the entire value chain to ensure that sustainability risks are addressed.

Our impact analysis took into consideration both direct and indirect impacts. Accordingly, we examined our responsibility for impacts on people and the environment that directly resulted from our activities, products, or services. At the same time, we consider impacts that arise in cooperation with third parties in the upstream and downstream value chains, as well as impacts where the responsible or contributing entity is connected to SGL Carbon through a direct or indirect business relationship. To conduct this analysis methodically, all relevant value chain steps were identified. Internal data and information, as well as the knowledge and experience of internal subject matter experts regarding production processes, resource use and emissions, were used to capture direct and indirect impacts. This approach ensured that we were able to thoroughly capture and assess the diverse sustainability impacts.

For the impact assessment of our materiality analysis, we consulted internal subject matter experts from relevant business units and corporate functions in topical workshops and incorporated their assessments into our analysis. We conducted an online survey to gather insights from our internal and external stakeholders (who also serve as external experts) about our business model and value chain operations, both upstream and downstream. These perspectives were then incorporated into our materiality analysis. Our regular activities to involve our stakeholders in the assessment of material sustainability matters are detailed in the chapter “Our stakeholders” – SBM-2.

For assessing the severity of actual impacts, we followed the ESRS guidelines and used three key categories:

1. **Scale:** How serious the impacts are for people or the environment, both positive and negative.
2. **Scope:** How widespread the impacts are, including geographical reach and number of affected living beings.
3. **Irremediability:** How easily and quickly a negative impact can be remedied. This category was only applied to negative impacts.

The applied assessment categories were each rated on a scale of 1 to 5, with 1 representing the minimum (very low) and 5 representing the maximum (very high) for each category.

For potential impacts, we also considered likelihood as an additional parameter. We applied different assessment approaches:

- **Weighting for negative impacts:** For actual negative impacts, the categories “scale,” “scope” and “irremediability” equally to assess overall “severity.” For potential negative impacts, “severity” and “likelihood” were given equal weight in the assessment.
- **Weighting for positive impacts:** Actual positive impacts were assessed based on “scale” and “scope,” with equal weighting applied here as well. For potential positive impacts, SGL Carbon also considered likelihood.

In our assessment framework, we recognized that for human rights impacts, severity takes precedence over likelihood. However, negative impacts on human rights were not identified as material in our double materiality analysis.

We also established time horizons for all impacts, following the guidance in ESRS-1 para. 6.4. This approach ensures consideration of both actual and potential sustainability impacts.

As soon as a defined impact reached or exceeded the defined relevance threshold of ≥ 3 (rating scale 1 to 5), the associated ESG topic was classified as material.

Our approach to assessing risks and opportunities was substantially based on the methodology for determining material impacts, as described above. In addition to the workshop

assessments, we worked closely with internal subject matter experts to conduct detailed calculations of the potential financial impacts of identified risks and opportunities on SGL Carbon's EBIT (earnings before interest and tax). This process was aligned with our existing financial risk management system.

The calculation of potential financial impacts considered various parameters, such as:

- possible investments for implementing actions to achieve targets and/or comply with new legal standards
- higher expenses for raw materials, waste management and/or carbon pricing
- potential penalties and expenses for non-compliance with legal provisions
- percentage assumptions of revenue and profit loss if potential risks materialize, e.g., through reputational damage
- assumptions about higher financing costs if we fail to meet our set targets

These quantitative determinations and assumptions of financial impacts made it possible for risks and opportunities to be categorized. In addition to the qualitative reasoning developed in the expert workshops, we also performed financial quantification by carrying out the corresponding calculations.

When identifying potential impacts, risks and opportunities, we considered that connections and dependencies might exist between various impacts, which could manifest in corresponding risks or opportunities. These relationships were analyzed to ensure an understanding of possible interactions. When a negative impact was identified, we simultaneously examined whether this impact would result in a relevant business risk for SGL Carbon. Similarly, positive impacts were systematically analyzed to determine whether they could lead to concrete opportunities for the company. Impacts, risks and opportunities where connections and interactions exist are discussed and presented in detail in the topical chapters of this report.

For the assessment of risks and opportunities, SGL Carbon followed its established financial risk management system to systematically capture and categorize financial effects and probability. The assessments were also made on a scale of 1 to 5, with 1 representing the minimum and 5 representing the maximum for each category. For evaluating risks and opportunities, the following categories were used in accordance with SGL Carbon's risk management system:

- 1. Financial effect:** Assessment of potential impacts on the Group's EBIT that may result from the risk or opportunity.
- 2. Probability:** Evaluation of the likelihood of occurrence for the respective risk or opportunity.

A detailed description of our financial risk management system can be found in the Group Management Report 2024 in the chapter "Opportunities and risk report"; we also provide an overview in this Sustainability Statement in the chapter "Governance" (GOV-5). The overall assessment is based on a quantitative threshold of ≥ 3 (scale of 1 to 5), which represents the average of financial effects and probability. This methodology ensures the identification of risks and opportunities that are significant for the business strategy.

Sustainability-related risks and opportunities are assessed and monitored at the same level as non-ESG-related corporate risks and opportunities within the company's risk management system. This means they are fully integrated into the company's standardized assessment and monitoring processes. Risk management assumes responsibility for regularly recording, evaluating and monitoring these risks and opportunities. By treating financial and non-financial risks and opportunities equally, we aim to ensure that sustainability aspects are always aligned with the company's strategic objectives and appropriately considered. Details on the risk management system can be found in the 2024 Group Management Report in the chapter "Opportunities and Risks Report."

To ensure tracking and further development of our ESG ambitions and goals, SGL Carbon has implemented an ESG governance structure that connects with our risk management process (see also the chapter "Governance" – GOV-2 and GOV-5). The Board of Management of SGL Carbon SE acts as the highest operational decision-making body and has integrated sustainability into the top leadership level due to its strategic importance. This integration ensures that processes for identifying, assessing and managing ESG risks

and opportunities systematically flow into the company's general risk management processes. More information about our governance structures and the implementation of sustainability matters in our strategy is presented in the chapter "Governance" (GOV-1 and GOV-2).

The detailed description of the decision-making process and associated internal control procedures for SGL Carbon's risk management is documented in the chapter "Governance" (GOV 5). The overview of the process for identifying, assessing, prioritizing and monitoring risks and opportunities that have potential financial impacts is consistent with the procedures outlined there. The structure presented also includes how SGL Carbon integrates the results of risk assessment and internal controls into the sustainability reporting process and incorporates them into relevant internal functions and processes.

The identification and assessment of impacts, risks and opportunities (double materiality analysis) has been integrated into existing processes. The assessment of impacts, risks and opportunities will be reviewed every two years and adjusted if necessary. A revision can also take place outside the regular review if needed. The next regular review is planned for the 2025 fiscal year.

The double materiality analysis based on ESRS requirements, which this Sustainability Statement refers to, took place in the 2023 fiscal year. The Sustainability Report for the 2023 fiscal year already used the materiality analysis as a basis for reporting. No changes to the process or approach took place in the reporting year. The material impacts, risks and opportunities resulting from the materiality analysis were updated during the reporting year as part of the annual risk inventory. For further information, please see the "Opportunities and risk report" as part of the 2024 Group Management Report. The next regular review of the materiality analysis is scheduled to take place in the 2025 fiscal year.

Sustainability matters identified as not material (E2-4)

To identify material impacts, risks and opportunities related to possible environmental pollution, SGL Carbon considered both our own sites and business activities, as well as upstream and downstream activities along the value chain as part of the double materiality analysis in 2023. Our approach has already been described in this chapter.

As part of this process, our sites and business activities were reviewed to capture current and potential issues regarding environmental pollution. Various scenarios were discussed concerning potential impacts, risks and opportunities. These included, for example, accidents that could lead to environmental and/or air pollution, water pollution, regulatory requirements for protecting air and the environment, as well as possible sanctions and legal disputes related to environmental pollution issues.

The interests and assessments of our stakeholders regarding potential environmental pollution hazards were also considered as part of the stakeholder survey conducted in 2023. SGL Carbon also maintains communication with affected neighboring communities and residents at our sites. For more information, see also the chapter "Our stakeholders" – SBM-2.

Potential environmental aspects such as air, soil and water pollution, as well as associated and potentially changing regulatory requirements were reviewed. However, the results of the materiality analysis showed that none of the identified impacts, risks or opportunities related to pollution were classified as material. Developments in this area continue to be monitored so that we can respond promptly if there are changes in the relevance of the various factors.

SGL Carbon also conducted a review of possible current and potential impacts, risks and opportunities related to water and marine resources as part of its double materiality analysis in 2023, in accordance with the process described in this chapter. The investigation covers all production sites and business activities and considers both the actual use of water and the procedures for wastewater return. During the internal expert workshops, it was confirmed that water is not a significant resource for the production of SGL products and that SGL Carbon sites largely use recirculation systems for used water. Current and future regulatory requirements regarding water use and pollution were also included in the assessment. No material impacts, risks or opportunities were identified in respect of the topic of water and marine resources.

The interests and assessments of our stakeholders regarding potential water use were also considered as part of the stakeholder survey conducted in 2023. For more information, see also the chapter "Our stakeholders – SBM-2".

As part of the double materiality analysis conducted in 2023, relevant aspects regarding biodiversity and ecosystems were also analyzed for our own business model and along the upstream and downstream value chain. In the upstream value chain, particular attention was paid to raw material extraction, while the assessment of our own business activities considered the proximity of SGL sites to protected ecosystems, including our activities near the Lechauen nature reserve at the Meitingen site. However, the result of the analysis does not indicate the materiality of the topic of biodiversity and ecosystems. No significant dependencies on biodiversity and ecosystems were identified. Our business activities have no direct material impact on existing ecosystem services.

The risk assessment in the area of biodiversity focused on potential transition risks associated with the possible negative public perception. If our activities were to impair biodiversity in the future, this could result in reputational damage. However, physical risks regarding biodiversity were not considered relevant, as no direct material impacts on natural habitats are expected.

Systemic risks were not considered in the materiality analysis, as SGL Carbon has no direct material impact on biodiversity and ecosystems that could lead to a possible collapse of ecosystems or large-scale losses in specific geographical or economic areas. Additionally, there are no cumulative risks arising from the fundamental impacts of biodiversity loss on transition or physical risks across multiple sectors. The risk of financial contagion, where the financial difficulties of individual companies due to inadequate consideration of biodiversity risks could spread to the entire economic system, was also classified as not relevant, as there are no material exposures in this area.

The topic of land use change was included in the stakeholder survey. For detailed information on the stakeholder survey, see the chapter "Our stakeholders - SBM-2." Additional consultations with affected communities regarding biodiversity and the impacts of our activities on ecosystems have not taken place to date.

The double materiality analysis considered impacts on nature in the upstream supply chain. The focus was on potential impacts on nature as a stakeholder, without specifically highlighting affected communities.

No significant impacts on affected communities were identified.

In addition, no negative impacts on relevant ecosystem services were found. Consequently, no actions for minimization or mitigation are currently required on the part of SGL Carbon.

SGL Carbon operates a site near the Lechauen nature reserve in Meitingen. To date, no significant negative impacts on natural habitats or resident species have been identified in relation to SGL Carbon's business activities. Nor do we expect negative impacts in the future.

The double materiality analysis did not identify any material current or potential negative impacts on biodiversity. As a result, SGL Carbon currently sees no need to develop specific actions to mitigate possible impacts on biodiversity.

Covered disclosure requirements

To facilitate navigation within the Sustainability Statement, the following index provides an overview of the disclosure obligations considered as well as datapoints from other EU legal provisions which SGL Carbon reports in accordance with the ESRS, including page numbers and marking of disclosure requirements classified as "Not material." SGL Carbon is not required to report according to Regulation (EU) 2019/2088, Regulation (EU) No. 575/2013, and Regulation (EU) 2016/1011. The datapoints in connection with Regulation (EU) 2021/1119 are listed separately and referenced accordingly.

	Disclosure requirement	To be reported	Page
BP-1	General basis for preparation of Sustainability Statements	Yes	2
BP-2	Disclosures in relation to specific circumstances	Yes	2
GOV-1	The role of the administrative, management and supervisory bodies	Yes	4
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Yes	4
GOV-3	Integration of sustainability-related performance in incentive schemes	Yes	6
GOV-4	Statement on due diligence	Yes	7
GOV-5	Risk management and internal controls over sustainability reporting	Yes	8
SBM-1	Strategy, business model and value chain	Yes	9
SBM-2	Our stakeholders	Yes	11
SBM-3	Material impacts, risks and opportunities	Yes	12
IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	Yes	17
IRO-2	Disclosure requirements in ESRS covered by the undertaking's Sustainability Statement	Yes	17
E1- GOV-3	Integration of sustainability-related performance in incentive schemes	See GOV-3	6
E1-1	Transition plan for climate change mitigation (incl. Regulation [EU] 2021/1119, Article 2 para. 1)	Yes	27
E1- SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	See SBM-3	12

	Disclosure requirement	To be reported	Page
E1-IRO 1	Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Yes	17
E1-2	Material impacts, risks and opportunities and their interaction with strategy and business model	Yes	13
E1-2	Policies related to climate change mitigation and adaptation	Yes	28
E1-3	Actions and resources in relation to climate change policies	Yes	30
E1-4	Targets related to climate change mitigation and adaptation	Yes	31
E1-5	Energy consumption and mix	Yes	33
E1-6	Gross scopes 1, 2, 3 and total GHG emissions	Yes	34
E1-7	GHG removals and GHG mitigation projects financed through carbon credits (incl. Regulation [EU] 2021/1119, Article 2 para. 1)	Not material	-
E1-8	Internal carbon pricing	Yes	36
E1-9	Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	No (phase-in provision)	-
E2	Pollution	No, not material	-
E3	Water and marine resources	No, not material	-
E4	Biodiversity and ecosystems	No, not material	-
E5-1	Policies related to resource use and circular economy	Yes	38
E5-2	Actions and resources related to resource use and circular economy	Yes	39
E5-3	Targets related to resource use and circular economy	Yes	40
E5-4	Resource inflows	Yes	41
E5-5	Resource outflows	Yes	42

	Disclosure requirement	To be reported	Page
E5-6	Anticipated financial effects from resource use and circular economy–related impacts, risks and opportunities	No (phase-in provision)	-
S1-SBM 2	Interests and views of stakeholders	Yes	11
S1-SBM 3	Material impacts, risks and opportunities and their interaction with strategy and business model	Yes	12
S1-1	Policies related to own workforce	Yes	53
S1-2	Processes for engaging with own workers and workers’ representatives about impacts	Yes	60
S1-3	Processes to remediate negative impacts and channels for own workers to raise concerns	Yes	61
S1-4	Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Yes	56
S1-5	Targets related to managing material negative impacts, advancing positive impacts and managing material risks and opportunities	Yes	56
S1-6	Characteristics of the undertaking’s employees	Yes	62
S1-7	Characteristics of non-employee workers in the undertaking’s own workforce	Yes	63
S1-8	Collective bargaining coverage and social dialog	Yes	64
S1-9	Diversity metrics	Voluntary reporting, not material (ESRS 1.114)	64
S1-10	Adequate wages	Yes	64
S1-11	Social protection	Yes	64

	Disclosure requirement	To be reported	Page
S1-12	Persons with disabilities	No	64
S1-13	Training and skills development metrics	Yes	65
S1-14	Health and safety metrics	Yes	66
S1-15	Work-life balance metrics	Yes	66
S1-16	Remuneration metrics (pay gap and total remuneration)	Voluntary reporting, not material (ESRS 1.114)	66
S1-17	Incidents, complaints and severe human rights impacts	Yes	61
S2	Workers in the value chain	No, not material	-
S3	Affected communities	No, not material	-
S4	Consumers and end-users	No, not material	-
G1-GOV-1	The role of the administrative, management and supervisory bodies	See GOV-1	4
G1-IRO-1	Description of the processes to identify and assess material impacts, risks and opportunities	See IRO-1	17
G1-1	Business conduct policies and corporate culture	Yes	68
G1-2	Management of relationships with suppliers	Voluntary reporting, not material (ESRS 1.114)	69
G1-3	Prevention and detection of corruption and bribery	Yes	71
G1-4	Confirmed incidents of corruption or bribery	Yes	71
G1-5	Political influence and lobbying activities	No, not material	-
G1-6	Payment practices	No, not material	-

The materiality analysis forms the starting point for SGL Carbon’s sustainability reporting in accordance with the ESRS. This Sustainability Statement includes datapoints on material sustainability matters of SGL Carbon resulting from the materiality of an impact and/or financial materiality. A quantitative threshold of ≥ 3 was applied to determine materiality. A detailed process description for determining material sustainability matters, including a description of the thresholds applied, can be found in chapter, “Procedure for assessing materiality.” To disclose material information regarding the impacts, risks and opportunities we assessed, we relied on information provided by EFRAG for mapping subtopics and sub-subtopics to datapoints. This mapping helped us identify the materiality of individual datapoints and disclose relevant information in accordance with ESRS requirements.

This report also includes non-material datapoints for continuity purposes for users of the Sustainability Statement. Voluntarily reported datapoints are marked as such in the respective chapters to ensure that the provision of information about the material topics and associated datapoints is not impaired (ESRS 1.114).

Climate Change (E1) - Environmental Matters

Information in accordance with ESRS 2

In 2023, as part of our double materiality assessment, we subjected our strategy and business model to a resilience analysis regarding climate change, incorporating climate-related physical and transition risks to identify significant risks for SGL Carbon. The risk assessment followed the approach outlined in Chapter IRO-1 and was deepened and evaluated through three different climate scenarios during the resilience analysis. We applied the following publicly available climate scenarios from the Intergovernmental Panel on Climate Change (IPCC), the Shared Socioeconomic Pathways (SSPs) (unassured):

1. **SSP1-2.6 – The 2-degree path:** This scenario describes an internationally coordinated development following the Paris Agreement, which makes it possible to limit global warming to 2 degrees Celsius compared to the pre-industrial period through active climate change mitigation.
2. **SSP3-7.0 – Regional rivalries:** In this scenario, nationalism and regional conflicts dominate. National interests and regional conflicts lead to high demand for raw materials and energy, which is largely met with readily available fossil fuels such as coal. This results in increasingly significant challenges in climate change adaptation worldwide, which must largely be taken on by states independently. Global issues lose priority.
3. **SSP5-8.5 – The fossil path:** Social and economic development of a rapidly developing world based on active and increased use of fossil resources is accompanied by an energy-intensive lifestyle worldwide. Actions to prevent climate change are reduced to a minimum. The focus here is on economically driven growth that relies heavily on fossil fuels. Although the global economy grows and local environmental problems such as air pollution are successfully combated, dependence on fossil fuels remains high.

The regulation of impacts, risks and opportunities related to climate change is also part of our strategies, processes and structures for analyzing the resilience of our business model. Further details can be found in the chapter “Material impacts, risks and opportunities (SBM3).”

The resilience analysis considers SGL Carbon’s entire upstream and downstream value chains as well as our own operations. In addition, no material physical risks or transition

risks were excluded. The time horizon of the scenarios considers a period until 2050. Accordingly, the following factors were considered in the resilience analyses:

Physical impacts of climate change

Physical risks related to climate can arise from acute and/or chronic changes in weather events or longer-term climate changes. Chronic physical climate hazards were classified according to Delegated Regulation (EU) 2021/2139 and include temperature changes, changes in wind conditions, precipitation patterns and/or sea levels. Acute physical risks include heat waves, storms, droughts, forest fires and wildfires.

Such risks can lead to flooding and storm damage to our facilities, interruptions of production processes, infrastructure failures and potential accidents. In 2023, SGL Carbon modeled future weather scenarios and their impacts on our facilities based on the three climate scenarios already described as part of its double materiality assessment. No significant climate-related physical risks were identified.

Climate-related transition risks according to TCFD classification include legal and regulatory, technological and market-related impacts as well as changes in customer preferences and negative stakeholder feedback related to climate change, including tariffs, taxes and other carbon levies.

The qualitative resilience analysis, including consideration of climate scenarios, revealed a significant climate-related transition risk for SGL Carbon regarding the increased pricing of greenhouse gas emissions. Changes in the legal framework and associated price increases for greenhouse gas emissions and/or stricter regulations may be associated with higher costs for SGL Carbon and as such may represent a financial risk for SGL Carbon.

The assessment of the potential financial risk is based on our transition plan (see also section “Transition plan for climate change mitigation” – E1-1) for reducing greenhouse gas emissions (Scope 1 and 2) and our experts’ assumptions on the pricing of these emissions. The medium and long-term emission values for Scope 1 and 2 emissions targeted according to our transition plan were multiplied by the forecast prices. The price forecast also considered the three climate scenarios we used. Depending on the time horizon (medium and long-term) and climate scenario, the determined financial impacts can total up to €17.8 million.

In the framework of our qualitative resilience analysis, we identified climate-related risks that affect our business model and assessed their effects on our business model. Based on the information currently available and the climate scenarios described above, we believe that no material individual risks from climate change exist – neither now nor in the foreseeable future – that could jeopardize the company as a going concern. Even the cumulative consideration of the individual risks does not jeopardize the continued existence of SGL Carbon as a going concern. Thanks to our regionally diversified setup, increased use of renewable energies, and the ability to adapt manufacturing processes in a climate-friendly manner, we consider SGL Carbon’s business model to be sufficiently resilient. Ultimately, however, residual risks remain in all entrepreneurial activities and cannot be ruled out even by conducting a comprehensive analysis of resilience.

Transition plan for climate change mitigation (E1-1)

SGL Carbon developed a transition plan for climate change mitigation in 2021, which was first disclosed in the company’s 2021 Annual Report.

Our climate change mitigation transition plan aims to halve greenhouse gas emissions by 2025 compared to the base year of 2019. Our climate targets relate to Scope 1 and Scope 2 emissions, with net climate neutrality targeted by 2038. Unavoidable emissions, which could arise from processes that, due to technological constraints, cannot be fully converted to hydrogen or electrified by 2038 and therefore would continue to be operated wholly or partially with natural gas, must then be offset.

Scope 3 emissions are not part of our transition plan, which means it is not a comprehensive transition plan according to ESRS E1-1.

Within these constraints, SGL Carbon’s climate targets aim to reduce the Group’s greenhouse gas emissions in alignment with the 1.5-degree target of the Paris Agreement.

SGL Carbon aims to achieve net climate neutrality by 2038, which would be ahead of the Paris Agreement’s target of achieving climate neutrality by 2050.

By 2025, SGL Carbon plans to work on energy efficiency and source energy from renewable sources (green electricity and biomass). After 2025, processes currently running on fossil gas will be gradually converted to hydrogen, biogas or electricity.

Additionally, measures for carbon capture and storage (CCS) or carbon capture and usage (CCU) could be considered in the future. The company expects that CCS/CCU technologies could reach the economic and technological market maturity required for SGL Carbon by 2030 at the earliest.

Energy efficiency and climate change mitigation are examined for SGL Carbon investment projects as part of their approval process. One example is the steam generation at the Lavradio plant (Portugal), which was converted from natural gas to biomass. Around €15 million was invested here from 2022 to 2024.

Additional investments and operating costs related to the climate change mitigation transition plan were incurred as part of energy management according to ISO 50001, for on-site photovoltaic projects and for the purchase of green electricity through certificates of origin.

Regarding the financial resources (Opex, Capex) for implementing the climate change mitigation transition plan, we refer to the presentation in the section Actions and resources in relation to climate change policies (E1-3).

Greenhouse gas emissions occur particularly at SGL Carbon’s large sites where products or intermediate products are produced using high-temperature processes. The following sites account for around 88% of SGL Carbon’s Scope 1 and location-based Scope 2 emissions: Bonn (Germany), Lavradio (Portugal), Meitingen (Germany), Morganton (USA), Moses Lake (USA), Muir of Ord (Great Britain), Nowy Sacz (Poland), Raciborz (Poland), St. Marys (USA), Yangquan (China).

The most emission-intensive products are the graphitized materials from the Graphite Solutions business unit, acrylic fibers and their precursors, and carbon fibers and their precursors.

These emissions do not jeopardize the achievement of SGL Carbon’s emission reduction targets. Instead, the goal of our climate plan is to progressively avoid these emissions.

Electrified processes achieve climate neutrality through electricity sourced from renewable sources. However, not all SGL Carbon processes can be electrified. Transition risks for gas-

operated processes could arise from delayed market and technological maturity, particularly for hydrogen.

Any inherent greenhouse gas emissions must be addressed through compensation projects or technologies for carbon capture and storage or usage (CCS, CCU). The availability of these technologies depends on various factors, including technological developments, economic conditions and regulatory measures.

Since it is difficult or impossible to substitute SGL Carbon's products in many applications, the company expects that any additional costs can be passed on to customers.

SGL Carbon's economic activities are subject to climate change regulations, particularly under the EU Climate Law and the EU Taxonomy Regulation. These regulations require SGL Carbon to align its business practices and investments with the EU's sustainability goals. The European Climate Law stipulates that the EU must achieve net-zero greenhouse gas emissions by 2050.

Regarding the alignment of investments (Capex) and operating expenses (Opex) with climate criteria, SGL Carbon follows the legal reporting requirements of the EU Taxonomy.

For further details, we refer to the section "Information in Relation to Article 8 of the EU Taxonomy of this report.

SGL Carbon did not make any investments in economic activities related to coal, oil or gas during the reporting period.

SGL Carbon is not exempt from the Paris-aligned EU benchmarks under Article 12(1)(d) to (g) and Article 12(2) of Delegated Regulation (EU) 2020/1818.

SGL Carbon incorporates insights from its non-comprehensive climate transition plan for Scope 1 and Scope 2 greenhouse gas emissions into its corporate strategy decarbonization considerations. Initial measures have been incorporated into financial planning.

The company's investments are focused on growth areas that contribute to decarbonization, such as the semiconductor and electric mobility markets, as well as the solar and LED industries.

Financial resources are being invested in expanding production capacities for graphite products needed for the production of silicon carbide-based high-performance semiconductors used for electrification and the transition to renewable energy. In 2024, approximately 62% of investments were allocated to the Graphite Solutions business unit, supported by significant advance payments from customers who also want to secure future production capacities. For more details about our investments, please refer to the "Investments and depreciation" section in the Group Management Report.

The transition plan was developed in 2021 in collaboration with the Board of Management.

Since 2019, annual Scope 1 and location-based Scope 2 emissions have been reduced from a total of 393 kt CO₂e to 239 kt CO₂e in 2024. This represents a decrease of approximately 39%. The reduction potential of the biomass plant at the Lavradio site (Portugal) amounts to up to 40 kt CO₂e annually in addition.

The company plans to revise its climate change mitigation plan by the end of the 2027 fiscal year and publish a comprehensive transition plan that includes Scope 3 greenhouse gas emissions.

Policies related to climate change mitigation and adaptation (E1-2)

SGL Carbon recognizes climate change as one of the greatest challenges of our time. The company addresses greenhouse gas emissions in its Global Environmental Policy, which was revised in 2022, and has dealt with impacts, risks and opportunities related to climate change mitigation and climate change adaptation.

Political and legal risks for SGL Carbon exist due to potentially increased certificate prices for greenhouse gas emissions in the future, as well as through climate-related regulations of existing products, services and potential regulations regarding SGL Carbon's production processes.

Market risks could arise from changes in customer behavior and from rising costs or reduced availability of raw materials.

The company sees technology risks of high importance in the potential costs of transitioning to technologies with lower emissions. An example of this is the conversion from natural gas to hydrogen as an energy carrier.

With respect to acute physical risks, wind-related (e.g., cyclones, hurricanes, typhoons, storms) or water-related (e.g., drought, heavy precipitation and flooding) risks at selected sites are particularly relevant. These physical risks caused by climate change were identified as not material.

The material impacts, risks and opportunities related to climate change mitigation and climate change adaptation identified in our materiality analysis can be found in Chapter ERSR 2 SBM-3.

The company has developed a strategy to address its material impacts, risks and opportunities in the area of climate change mitigation and climate change adaptation. This strategy focuses on several key areas:

Climate change mitigation is part of SGL Carbon's sustainability strategy. The company has committed to reducing its CO₂ emissions (Scope 1 & 2) by 50% by 2025 and becoming net climate-neutral by 2038. To achieve these goals, SGL Carbon makes use of a variety of actions, including switching to renewable energy, optimizing energy efficiency, electrifying processes and using new technologies such as hydrogen.

The ISO 50001 energy management system was introduced at the most energy-intensive European production sites in 2015. Currently, eight sites are successfully ISO 50001:2018 certified, accounting for about 52% of SGL Carbon's total energy consumption: Bonn, Meitingen (Germany), Chedde (France), Lavradio (Portugal), Muir of Ord (Great Britain), Nowy Sacz (Poland), Raciborz (Poland) and Wiesbaden (Germany). SGL Carbon aims to increase energy efficiency and reduce energy intensity by a total of 10% by 2027 compared to 2017 through measures within ISO 50001.

The use of renewable energy is part of SGL Carbon's climate change mitigation strategy. The company has launched projects to use solar energy and biomass. In 2024, rooftop PV systems were installed at the sites in Ried (Austria), Ort (Austria), Meitingen and Bonn (Germany). In 2024, a biomass plant for steam generation was commissioned in Lavradio

(Portugal). This plant is intended to replace the previous purchase of steam generated with natural gas.

As part of our climate strategy, our business units began creating climate-related assessments of their products in 2022. These so-called Product Carbon Footprints (PCFs) capture and calculate the greenhouse gas emissions generated over a product's lifecycle. For this task, we use a software solution and databases to analyze the environmental impacts of our production processes. These results enable us to identify and implement effective actions to reduce the carbon footprint at the product level. Our PCF assessment covers the upstream supply chain (cradle-to-gate) and follows internationally recognized standards and norms, particularly ISO standards 14040, 14044 and 14067.

By the end of 2024, the Graphite Solutions business unit had subjected around 54% (based on divisional sales) of its product portfolio to PCF assessment, already achieving the original target of 50% (based on division sales) set for 2025. In 2025, our goal is to further increase this proportion.

SGL Carbon views climate change adaptation from two perspectives. On the one hand, the company expects a long-term increase in extreme weather events and addresses this in corporate risk management and in developing measures at potentially vulnerable sites.

On the other hand, the company expects changing demand and focuses on diversifying its product portfolios to serve markets that are likely to show positive development trends, partly due to climate change. For example, the development of materials and solutions for the semiconductor industry, wind energy, electric mobility and hydrogen technology targets long-term market changes caused by climate change.

These expectations are based on internal expert assessments and publicly available climate and environmental forecasts.

Strategy development and implementation is the responsibility of the company's Board of Management as the highest decision-making body. It is supported by an ESG governance structure (see also Chapter ESRS 2 General Disclosures). This approach shows that SGL Carbon addresses climate change mitigation and adaptation to climate change both to reduce its own emissions and to support its customers in implementing their climate strategies through suitable materials and solutions.

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

The actions taken by SGL Carbon for climate change mitigation relate to our own operations. The largest single project related to climate change mitigation in the 2024 fiscal year was the biomass project of the Carbon Fibers business unit at our Lavradio plant (Portugal).

The development and installation of the plant began in 2022. It serves to generate steam needed for the production of textile and carbon fibers. The plant can replace previously externally sourced steam, which was obtained from a natural gas-operated facility. The necessary biomass, certified wood pellets from forestry waste, is preferably sourced locally from within a radius of around 300 kilometers around the plant.

Various operating modes were piloted throughout 2024. In total, the biomass plant delivered around 44 GWh of steam. This saved around 8 kt CO₂e in the reporting year. In total, this plant can save up to 40 kt CO₂e of greenhouse gas emissions, depending on capacity utilization and operating mode.

The energy management system according to ISO 50001 remained a cornerstone of SGL Carbon's climate change mitigation measures in 2024.

It was introduced at the most energy-intensive European production sites in 2015. Currently, eight sites are ISO 50001:2018 certified, accounting for about 52% of SGL Carbon's total energy consumption: Bonn (Germany), Meitingen (Germany), Chedde (France), Lavradio (Portugal), Muir of Ord (Great Britain), Nowy Sacz (Poland), Raciborz (Poland) and Wiesbaden (Germany).

In 2024, the external audits were carried out in a uniform manner by certification company DMSZ (Deutsche Managementsystem Zertifizierungsgesellschaft mbH). The regular

recertification of our energy management system was successfully completed without any inconsistencies.

All energy efficiency projects at ISO 50001 certified sites are recorded in a central database. This database facilitates measures and effect controlling of all planned projects with respect to implemented and expected energy efficiency improvements.

In the reporting year, investments were made in energy-efficient insulation of a graphitization furnace at the Meitingen site. A new, more energy-efficient air compressor was also installed in Meitingen, and the heating system was further optimized. Preparations were made to integrate the waste heat from the thermal post-combustion (exhaust air purification) of another production plant into the central heating system at the Meitingen site and the first system components were installed. The goal is to complete this integration in the following year.

Additional energy meters were installed at the Bonn (Germany), Lavradio (Portugal) and Meitingen (Germany) sites to enable more targeted analysis of consumption data. The meters are integrated into the digital data collection of the respective control systems. This improves data scope and quality as a basis for further energy-saving projects.

Various process optimization projects were continued. Permanent energy savings with little or no investment are achieved through energy-optimized process control, such as the selective reduction of selected process temperatures in the carbonization manufacturing process step.

In 2024, SGL Carbon continued to look for opportunities to implement additional photovoltaic (PV) areas at its own sites.

In Meitingen, the company has initiated the implementation of a ground-mounted photovoltaic system. This is expected to provide around 4.5 GWh per year from 2025. The project partner bears the direct PV-related investments and will be compensated through the purchase agreement. The site's power infrastructure (transformer station) was upgraded to enable grid feed-in.

In Bonn and Meitingen, planning began for rooftop PV systems with annual outputs of around 1.8 GWh in Bonn and around 0.8 GWh in Meitingen. These installations are scheduled to be completed in 2025.

All projects will be implemented with an operating partner. Electricity will be purchased through long-term contracts (Power Purchase Agreements, PPAs).

In the Innkreis region of Austria, photovoltaic systems were already put into operation in 2021 and 2023 in Ort (450 kWp peak output) and Ried (530 kWp peak output), respectively. These installations were implemented with a project partner. The installation was carried out on the roofs of the production buildings.

In the reporting year, plans were initiated for the installation of an additional 800 kWp peak output in the Innkreis region. In addition to a conventional roof installation, the project team is also analyzing the possibilities of partially covering open parking areas. These installations are scheduled to be completed in 2026.

For several years now, our production sites in Ort, Ried and Wackersdorf have been sourcing electricity in the form of renewable energy. Since 2022, our two Polish sites in Nowy Sacz and Raciborz have covered 100% of their electricity needs with green power, and since 2023, our Italian site in Verdello has done the same.

In the reporting year, SGL Carbon analyzed global opportunities for sourcing green electricity. For this purpose, a specialized consulting company was also engaged. Established certificates of origin (so-called Guarantee of Origin, GoO), which are accepted by the GHG Protocol and organizations such as cdp.net, are being considered. The acquisition of certificates is to be gradually increased.

SGL Carbon funds its climate-related investments and actions from the company's investment and operating budget. The company generally aims to generate these funds through its own efforts. As such, the implementation of measures does not depend on the availability and allocation of external funds. Where reasonable and available, the company uses public funding.

From 2022 to 2024, €9.8 million was allocated to the construction of a steam generation plant using biomass at our site in Lavradio, Portugal. Of this amount, €248 thousand was invested in 2024. The total budget for the project is approximately €15 million.

The project to build a steam generation plant using biomass at our site in Lavradio, Portugal, is reported in the "Disclosures related to article 8 of the EU taxonomy" section and there in the Capex template under the category Generation of heat and steam (CCM 4.24).

Targets related to climate change mitigation and adaptation (E1-4)

The emission of greenhouse gases (GHG) is a significant environmental impact of SGL Carbon's business activities. Accordingly, we measure the GHG emissions we cause and have set targets for their reduction.

Our GHG emissions are Scope 1 emissions resulting from combustion processes and Scope 2 emissions, which are in particular attributable to power and steam consumption.

Scope 3 emissions are not yet included in SGL Carbon's climate targets.

In 2021, SGL Carbon set itself the goal of cutting total emissions (defined as the sum of Scope 1 and Scope 2 emissions) in half by 2025 compared to the emissions of the reference year 2019. We want to reduce our emissions by 100% and become climate-neutral by 2038. This is a net climate neutrality target, meaning unavoidable emissions will be offset. Compensation options include projects to reduce greenhouse gas emissions through energy efficiency (including projects using renewable energy), projects to avoid emissions (for example through forest protection) or projects that directly remove and store greenhouse gases from the atmosphere (either through nature-based approaches such as afforestation, reforestation and recultivation) or through technical solutions such as Direct Air Capture and Carbon Storage. The exact composition of compensation measures by 2038 will depend on the economic and technological availability of different project types and cannot be conclusively assessed today.

In the 2024 fiscal year, SGL Carbon's Scope 1 and 2 CO₂ emissions totaled 239 thousand metric tons (2023: 295 thousand metric tons). The decrease is based, among other things, on our already initiated and implemented reduction measures. If CO₂ emissions are

compared with economic output, in 2024 they decreased from 0.27 kt per €1.0 million in sales to 0.23 kt per €1.0 million in sales compared to the previous year.

In kt CO ₂ e	Base year 2019	Target 2025	Delta vs. base year	Target 2038	Delta vs. base year	Actual 2024	Delta vs. base year
Scope 1 GHG emissions	90	85	-6%	0	-100%	65	-28%
Scope 2 GHG emissions (location-based)	303	115	-62%	0	-100%	174	-43%
Scope 3 GHG emissions	N/A	N/A	-	N/A	-	-	-
Scope 1- and Scope-2 GHG emissions total	393	200	-49%	0	-100%	239	-39%

The company's climate target published for 2021 relates to the sum of Scope 1 and Scope 2 GHG emissions. The breakdown of the target into Scope 1 and Scope 2 above was estimated and prepared retrospectively for the purpose of presentation.

N/A: not specified (this value is not part of the company's climate target)

SGL Carbon records its Scope 1 and Scope 2 emissions at all significant Group sites. The reduction targets relate to the sum of emissions from all significant sites.

For materiality reasons, no data is collected for the leased sales offices of SGL Graphite Solutions Taiwan Ltd., SGL CARBON ASIA-PACIFIC SDN BHD, SGL CARBON Korea Ltd., and SGL CARBON Ltd. (Alcester, UK).

The emissions in the base year 2019 were determined for the entire Group. The year 2019 is representative, as our economic activities were not yet affected by the consequences of the COVID pandemic from 2020 to 2022.

Group sales in 2019 amounted to €1,086.7 million (compared to €1,047.5 million in 2018).

SGL Carbon sets climate targets that provide for a reduction in greenhouse gas emissions in Scope 1 and Scope 2. These targets are aligned with climate pathways from the Science Based Targets initiative (SBTi) and support limiting global warming. Since SGL Carbon, as a manufacturer of carbon and graphite products, is not assigned to any of the sectoral

decarbonization pathways as established 2019, a company-specific climate pathway was developed that takes into account economic and technological development as well as stakeholder expectations.

Greenhouse gas (GHG) reduction targets are generally considered "science-based" if they align with the latest climate science and ensure that companies contribute to limiting global warming to 1.5°C compared to pre-industrial levels, as set out in the Paris Agreement. The Science Based Targets initiative (SBTi) is an organization that helps companies set science-based climate targets. SBTi's targets are widely accepted and are considered "science-based". However, the SBTi methodology is subject to inherent uncertainties regarding the underlying scientific findings and forward-looking assumptions about greenhouse gas emission reductions needed to achieve the 1.5°C goal. The SBTi methodology published in 2021 is currently being revised. New scientific findings on the course of climate change could lead to a change in the SBTi methodology and the assessment of whether the ambition level of the targets is sufficient to limit global warming to 1.5°C.

Currently, our climate pathway exclusively covers Scope 1 and Scope 2 emissions, as the full integration of Scope 3 emissions is not yet fully feasible due to the complexity of the value chain and existing data gaps. However, SGL Carbon is continuously working to improve transparency and the data basis for Scope 3 emissions and plans to develop a comprehensive climate transition plan covering all scopes by 2027 at the latest.

SGL Carbon's greenhouse gas targets are to be achieved using the following decarbonization levers:

By 2025, the use of renewable energy and improvement of energy efficiency is planned. This includes rooftop photovoltaic installations at our own sites, the procurement of electricity from renewable sources (via certificates of origin and/or Power Purchase Agreements) and steam generation using biomass at our site in Lavradio (Portugal). Improvement in energy efficiency is pursued through our energy management program according to ISO 50001. Overall, these measures aim to reduce the annual sum of Scope 1 and Scope 2 greenhouse gases by 50% by 2025 compared to the base year 2019.

After 2025, we will additionally pursue the conversion of previously gas-operated processes to electricity (electrification of processes) and the use of hydrogen and biogas. The contributions from these decarbonization levers will depend particularly on availability as

well as economic and technological market maturity (example: hydrogen). We have not yet established quantitative reduction targets for these decarbonization levers. However, we anticipate that by 2038, approximately 10-20% of the emissions from the base year 2019 will be unavoidable. Based on internal company assessments, these inherent emissions must be offset to achieve net climate neutrality for the company.

The analysis and classification of climate-related risks and opportunities at SGL Carbon was carried out using the so-called Shared Socioeconomic Pathways (SSPs). These pathways describe in narrative form central trends in the areas of socioeconomics, demographics, technology, politics, institutions and lifestyles. SGL Carbon evaluated the SSP1 scenario, the “sustainable path,” which prioritizes global welfare and respect for planetary boundaries. This pathway is characterized by a reduction in income inequalities and low-resource consumption. SSP3, characterized by regional rivalries where nationalism and environmental destruction increase, and SSP5, which describes a world with high economic growth enabled by increased use of fossil fuels, promoting technological innovation but accompanied by an energy-intensive lifestyle and corresponding climate consequences, were also evaluated.

Physical risks, including expected climate changes, were elaborated with the corresponding Representative Concentration Pathways (RCPs) for atmospheric greenhouse gases and with the help of the IPCC WGI Interactive Atlas (<https://interactive-atlas.ipcc.ch/>) (unassured). In its scenario considerations, SGL Carbon assumes long-term temperature increases (by 2100) of 1.8 degrees (SSP1), 3.6 degrees (SSP3) and 4.4 degrees (SSP5).

Further information can be found in section SBM-3.

Energy consumption and mix (E1-5)

Energy consumption and mix

	Unit	2024
1 Fuel consumption from coal and coal products	MWh	0
2 Fuel consumption from crude oil and petroleum products	MWh	7,164
3 Fuel consumption from natural gas	MWh	337,110
4 Fuel consumption from other fossil sources	MWh	5,038
5 Consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources	MWh	291,416
6 Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	640,728
Share of fossil sources in total energy consumption	%	67.7
7 Consumption from nuclear sources	MWh	72,236
Share of consumption from nuclear sources in total energy consumption	%	7.6
8 Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	51,025
9 Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources	MWh	182,246
10 The consumption of self-generated non-fuel renewable energy	MWh	0
11 Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	233,272
Share of renewable sources in total energy consumption	%	24.7
Total energy consumption (calculated as the sum of lines 6, 7 and 11)	MWh	946,236

The energy intensity related to climate-intensive sectors was 0.92 GWh per €1.0 million in revenue in 2024. Energy consumption related to climate-intensive sectors was 946 GWh in 2024. SGL Carbon’s activities fall under the climate-intensive sector Manufacturing ((EC) 1893/2006, Annex I, Section C).

The energy intensity refers to consolidated Group revenue. Since all of SGL Carbon’s business is related to the Manufacturing sector, total emissions and total Group revenue from all business activities are allocated to this climate-intensive sector.

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

	Unit	Base year	Retrospective		Milestones and target years		Annual % target / Base year
			2024	2025	2030	2038	
Scope 1 GHG emissions							
Gross Scope 1 GHG emissions	kt CO ₂ e	2019	65	85	N/A	0	-5.3%
Percentage of Scope 1 GHG emissions from regulated emission trading schemes (%)	%	2019	0%	N/A	N/A	N/A	N/A
Scope 2 GHG emissions							
Gross location-based Scope 2 GHG emissions	kt CO ₂ e	2019	174	115	N/A	0	-5.3%
Gross market-based Scope 2 GHG emissions	kt CO ₂ e	2019	137	115	N/A	0	-5.3%
Significant scope 3 GHG emissions							
Total Gross indirect (Scope 3) GHG emissions	kt CO ₂ e	N/A	364	N/A	N/A	N/A	N/A
1 Purchased goods and services	kt CO ₂ e	N/A	194	N/A	N/A	N/A	N/A
2 Capital goods	kt CO ₂ e	N/A	15	N/A	N/A	N/A	N/A
3 Fuel and energy-related Activities (not included in Scope1 or Scope 2)	kt CO ₂ e	N/A	61	N/A	N/A	N/A	N/A
4 Upstream transportation and distribution	kt CO ₂ e	N/A	24	N/A	N/A	N/A	N/A
5 Waste generated in operations	kt CO ₂ e	N/A	5	N/A	N/A	N/A	N/A
6 Business travel	kt CO ₂ e	N/A	1	N/A	N/A	N/A	N/A
7 Employee commuting	kt CO ₂ e	N/A	6	N/A	N/A	N/A	N/A
8 Upstream leased assets	kt CO ₂ e	N/A	1	N/A	N/A	N/A	N/A
9 Downstream transportation	kt CO ₂ e	N/A	k.A.	N/A	N/A	N/A	N/A
10 Processing of sold products	kt CO ₂ e	N/A	k.A.	N/A	N/A	N/A	N/A
11 Use of sold products	kt CO ₂ e	N/A	k.A.	N/A	N/A	N/A	N/A
12 End-of-life treatment of sold products	kt CO ₂ e	N/A	23	N/A	N/A	N/A	N/A
13 Downstream leased assets	kt CO ₂ e	N/A	0	N/A	N/A	N/A	N/A
14 Franchises	kt CO ₂ e	N/A	0	N/A	N/A	N/A	N/A
15 Investments	kt CO ₂ e	N/A	33	N/A	N/A	N/A	N/A
Total GHG emissions							
Total GHG emissions (location-based)	kt CO ₂ e	N/A	603	N/A	N/A	N/A	N/A
Total GHG emissions (market-based)	kt CO ₂ e	N/A	567	N/A	N/A	N/A	N/A
Sum of Scope 1 and Scope 2 GHG emissions (location-based)	kt CO ₂ e	2019	239	200	N/A	0	-5.3%

The breakdown of the target into Scope 1 and Scope 2 above was estimated and prepared retrospectively for the purpose of presentation. With regard to the Scope 2 target for 2025, the location-based Scope 2 target served as the best estimate for the market-based target due to the lack of a reliable database at the time the 2021 target was set.

SGL Carbon has not made any changes to the definition of the reporting entity or its value chain during the reporting period. Consequently, the comparability of the greenhouse gas emissions we report is maintained from year to year.

SGL Carbon employs the following recognized conversion factors to calculate Scope 1 and Scope 2 emissions: The conversion of direct CO₂ emissions (Scope 1) is based on the 2024 UK Government GHG Conversion Factors for Company Reporting of the Department for Environment, Food & Rural Affairs (DEFRA). This includes emissions resulting from the consumption of fossil fuels such as gas, oil, and diesel. The DEFRA factors for gas were also applied to district heating and steam, with a 25% surcharge to account for efficiency (company assumption: average efficiency of 80%). The country factors of the International Energy Agency (IEA, "Emission Factors 2022") are used for the location-based Scope 2 emissions in terms of electricity. IEA factors are also used to determine Scope 2 emissions in terms of compressed air. Supplier information was used to determine the market-based Scope 2 emissions in relation to electricity. Alternatively, IEA factors and factors from the U.S. Environmental Protection Agency (EPA) were used. SGL Carbon ensures consistency in reporting by reusing these recommended sources, which are also specified by the GHG Protocol.

GHG emissions intensity per net revenue	Unit	2024
GHG emissions total (location-based) per net revenue	kt CO ₂ e/1 mill. €	0.59
GHG emissions total (market-based) per net revenue	kt CO ₂ e/1 mill. €	0.55

The purchased renewable electricity came exclusively from bundled contractual instruments (i.e. the use of explicit renewable energy contracts). The share of purchased renewable electricity from bundled contractual instruments amounted to 6.6% (28,162 MWh) in the reporting year. The share of purchased renewable electricity from unbundled contractual instruments amounted to 0% (0 MWh) in the reporting year.

The biogenic emissions in relation to Scope 1 amounted to around 500 tons of CO₂e from steam generation with biomass at our Lavradio site (Portugal). To determine the emissions, purchasing data from SAP BW was used and the DEFRA factor for biomass from wood pellets was applied.

Biogenic emissions in relation to Scope 2 and Scope 3 could not be determined. The IEA factors (Scope 2) we use and our Scope 3 estimation approach do not allow for a breakdown by biogenic emissions.

For calculations, SGL Carbon uses a calculation/consolidation tool based on SAP (so-called Business Warehouse, BW and Strategic Enterprise Management Business Consolidation System, SEM-BCS).

The calculation of emissions in the upstream supply chain (Scope 3 categories 1 to 6) was carried out using the "estell 6.1" database from the consulting firm Systain Consulting GmbH (Hamburg). SGL Carbon selected the estell database as it provides a methodology for determining emissions in the upstream supply chain. SGL Carbon has relied on this database since 2022. The estell methodology is based on a detailed multi-regional input-output database (Environmentally-extended input-output, EEIO, database; see also GHG Scope 3 Protocol, Chapter 7), which is based on the input-output table of the OECD ICIO (2018 edition, data from 2015) (<https://www.oecd.org/sti/ind/inter-country-input-output-tables.htm>) and Exiobase 3.7 (2019 edition, data from 2016) (www.exiobase.eu) which is extended by additional data from the Bureau of Economic Analysis (BEA, www.bea.gov, accessed in 2019, data from 2012). Estell is updated annually in line with price trends using inflation data from DESTATIS and Eurostat.

The activity data was retrieved from SGL Carbon's procurement system (SAP Vendor Spent Report) as a purchase value in euros, categorized by cost type and country of origin. To determine the emissions in the supply chain, the purchase values are allocated to economic sectors by cost type and country and multiplied by estell's emission factors for each unit of demand, in each economic sector and region. The estell emission factors include the upstream emissions (cradle-to-gate) of all relevant process steps for each good or service. The model utilizes global warming potential (GWP) values from the IPCC's AR 6 (2023) for a 100-year period, including carbon feedbacks. The following Scope 3 categories were evaluated with estell: 1. purchased goods and services, 2. capital goods, 3. fuel and energy-related emissions (not included in Scope 1 or 2), 4. transportation and distribution (upstream), 5. waste, 6. business travel.

The percentage of emissions calculated using primary data from suppliers or other value chain partners in the reporting year is 0%.

Scope 3 Category 7, employee commuting, was estimated for the first time in the reporting year using global assumptions about distance and means of transport. No primary data was collected from employees; instead, assumptions were used that were taken from publicly available sources. Under Scope 3 Category 8, upstream leased assets, emissions from the company's leased vehicles are reported. The estimates are based on operating cost analyses from the leasing company.

Scope 3 Category 12, end-of-life treatment of sold products, was collected in a global multi-stage estimation. Sales volumes were estimated from SAP sales data, and an average carbon content was estimated for each product category by experts from the business units. Using OECD data, regional disposal routes were identified, and an average emission factor was estimated for each disposal route. The emission factor for recycled materials was set at zero. The emission factor for incineration without energy recovery was calculated assuming that 100% of the carbon content was converted to CO₂. The emission factor for incineration with energy recovery was calculated assuming that 25% of the carbon is converted to CO₂. The remaining CO₂ was allocated in net terms to energy generation.

The emissions of Scope 3 Category 9, downstream transport, were not determined. Downstream transports commissioned by SGL are included in Category 4. Upstream transport and distribution as specified in the Greenhouse Gas (GHG) Protocol. SGL Carbon plans to close this data gap in the future.

Due to the complexity of the company's customer, product and application portfolio, no reliable data could be estimated for Categories 10. Processing of sold products and 11. Use of sold products. SGL Carbon plans to close this data gap in the future.

Under Scope 3 Category 13, downstream leased assets, no emissions were recorded in the reporting year.

Scope 3 Category 14, franchises, was not relevant in the reporting year.

Under Scope 3 category 15, investments, we report the emissions (Scope 1, 2 and 3) of our subsidiary Brembo SGL Carbon Ceramic Brakes S.p.A. (Italy). The information is based on information from the associate company, which estimated its emissions for the 2023 fiscal year. An estimate for the 2024 fiscal year was not available at the time of reporting. The

data from 2023 served as a best estimate for the reporting year. The total emissions are recognized in accordance with the capital share of 50%.

The emissions of the investment MCC-SGL Precursor Co. Ltd. (Japan) are included in Scope 3 Category 1, purchased goods and services (purchased carbon fiber precursor). The emissions of the participation Fisigen S.A. (Portugal) are included in the Scope 2 emissions (purchased steam).

No significant events or changes in circumstances relevant to greenhouse gas emissions for the 2024 fiscal year occurred between the company's reporting dates and preparation of the sustainability declaration.

The investments in the project to construct a steam generation plant using biomass at our site in Lavradio, Portugal, are reported in the disclosures relating to Article 8 of the EU Taxonomy in the Capex declaration form under the category Generation of heat and steam (CCM 4.24).

The revenue from the consolidated income statement was used for the calculation of greenhouse gas intensities.

If Scope 1 and Scope 2 CO₂ emissions are compared to adjusted sales (excluding price, currency and other special effects), they have decreased from 0.27 kt CO₂e per €1.0 million in 2023 to 0.23 kt CO₂e per €1.0 million in 2024. This is a company-specific metric that is reported due to disclosure obligations in financing instruments (voluntary disclosure according to ESRS1.114).

Internal carbon pricing (E1-8)

SGL Carbon has been using an internal CO₂ price exclusively in its investment approval process ("Internal Carbon Pricing", ICP) since 2022. Only a so-called CO₂ shadow price is applied to compare investment alternatives. Other instruments, such as internal CO₂ fees or internal CO₂ funds, are not used.

The internal CO₂ price was set at €100/t CO₂e. This internal CO₂ price is at the record level of the price for emission certificates in the European Emissions Trading System (EU-ETS), which was reached in February 2023. By the end of February 2024, the price for emission

certificates in the EU-ETS had fallen to €56/t CO₂e. At the end of December 2024, it was around €72/t CO₂e.

The internal CO₂ price of €100/t was maintained unchanged under the assumption that the record level of the price for emission certificates in the European Emissions Trading System will be reached again. By the end of February 2024, the price of emission certificates in the EU ETS had fallen to €56/t CO₂e. This represents a significant decrease from the €72/t CO₂e recorded at the end of December 2024.

The internal CO₂ price of €100/t was left unchanged on the assumption that the record level of the price for emission certificates in the European Emissions Trading System will be reached again. As part of the group-wide global investment approval process, SGL Carbon analyzes the technical facilities, their expected energy consumption and the planned energy sources. Energy costs are recorded in the associated economic evaluation. In investment projects where different energy sources can be used through technological alternatives, the CO₂ shadow price is applied in the cost comparison calculation.

Since 2022, a total of three investment projects have been evaluated using the internal CO₂ price. As a result of implementing these investment projects, around 1.1 kt CO₂e additional Scope 1 emissions will be emitted (resulting from two projects) while 0.7 kt CO₂e Scope 1 emissions will be saved (resulting from one project). In total, the three investment projects are associated with additional emissions of approximately 0.4 kt CO₂e Scope 1 emissions per year. This corresponds to around 0.6% of SGL Carbon's Scope 1 emissions in the reporting year. These figures have not been validated by an external body.

These are gross GHG emissions. Scope 2 and Scope 3 emissions were not evaluated.

Since the company applies the internal CO₂ price exclusively for investment projects, a comparison with other internal CO₂ prices is not applicable.

The internal CO₂ price has not yet been used in the valuation of intangible assets and fixed assets, in impairment tests for assets, or in fair value measurement in connection with business acquisitions.

Resource Use and Circular Economy (E5) - Environmental Matters

Policies related to resource use and circular economy (E5-1)

SGL Carbon requires a wide range of resources (including non-renewable raw materials) to manufacture materials and products. Our manufacturing processes result in resource outflows (products and materials), including various waste streams.

SGL Carbon addresses the following substantive focus areas related to sustainable resource use, the circular economy and waste management in its Global Environmental Policy: We endeavor to act in a resource-efficient manner. SGL Carbon implements local and Group-wide initiatives aimed at minimizing consumption of natural resources, including targeted actions to reduce material and resource use. Our waste management approach is focused on waste prevention and reduction. Through our actions in this area, we aim to reduce the waste generated during production and to develop methods for reusing materials.

SGL Carbon's resource inflows primarily come from the chemical industry (e.g., acrylonitrile, special chemicals such as resins) and from the petrochemical and coal chemical industries (e.g., petroleum and pitch coke, pitch materials). Most of the inflows from the petrochemical and coal chemical industries are co-products generated in those sectors and then used by SGL Carbon to produce specialty graphites.

SGL Carbon aims to reduce its resource use and is working on increasing the share of recycled and renewable raw materials, as well as preventing waste or directing it for recycling.

In doing so, the company is addressing the following main risks identified in internal expert assessments based on past experience:

Non-renewable resources could become limited in availability, or become depleted in the long term, making the use of such resources less economical for SGL Carbon. This risk encompasses potential supply chain disruption, increasing costs, technological constraints, challenges in competitiveness and reputational risks for the company.

In some cases, manufacturers may be required by law to take back products. The obligation to take back non-recyclable products or materials from customers or end-users may entail additional costs for SGL Carbon due to the related transportation and disposal costs.

Given the limited disposal and recycling options, any increasing requirements related to the disposal of non-recyclable waste could lead to additional expenditure, and thus financial burden, for the company. At the same time, customers could face higher costs and reduced access to disposal services.

Further information on the processes for identifying material impacts, risks and opportunities can be found in the chapter "General disclosures" under the IRO-1 section. Please also refer to the SBM2 and 3 sections, where we set out the material resource use and circular economy-related impacts, risks and opportunities and the involvement of our stakeholders. Affected communities were not directly consulted. We have mainly incorporated their assessments through internal expert workshops and by surveying our employees, many of whom live in the direct vicinity of our sites.

Transparency and improved data availability are cornerstones of our corporate strategy regarding resource use and circular economy. SGL Carbon therefore determines its resource consumption by measuring, calculating and managing inflows and outflows at its global production sites, including energy consumption and the materials needed for its industrial and commercial processes.

The company measures and reports on waste volumes generated at its sites, how this waste is handled and whether the waste is reused or directed for disposal, e.g., via landfill or some other method. A distinction is made here between hazardous and non-hazardous waste.

The Board of Management is responsible for strategy development and policy implementation.

SGL Carbon pursues the use of secondary, recycled raw materials. In particular, residual materials from the company's production process stages are recycled for environmental and economic reasons.

By-products from the production of graphite blocks are ground and then reintroduced into the production process. Residual carbon fibers are used to produce injection-molded parts, among other things. Plastic packaging materials are being replaced by cardboard and other alternatives.

Within the scope of strategic development, SGL Carbon's business units strive for sustainable procurement and the use of renewable resources. Opportunities for these typically arise for SGL Carbon from biologically based raw materials such as bio-based acrylonitrile, which can be used to manufacture carbon-fiber precursors, or biologically based resin systems, which are used in fiber-reinforced components. In these bio-based source materials, petroleum-derived starting materials are replaced with renewable plant-based components. Procurement of such renewable raw materials usually entails additional costs. Accordingly, our approach also includes targeted identification of customers and customer segments willing to pay a premium for greener products.

With these concepts, SGL Carbon strives to reduce and, where technically and economically possible, avoid the use of primary raw materials. As a result, the company expects a relative increase in the use of secondary (recycled) resources. However, the related projects are still in their early stages.

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

Actions related to resource use and circular economy are implemented in our four business units and our Corporate unit.

In the area of the circular economy, the Graphite Solutions (GS) business unit is pursuing projects and approaches intended to optimize resource use and close material loops. Waste management, safe methods of disposal and economically feasible recycling activities contribute to this.

Where possible, by-products from graphite manufacturing are processed internally and repurposed for other applications, with the aim of reducing waste and increasing production efficiency.

Moreover, graphite-containing dust from mechanical finishing is reintroduced into the production process, thereby reducing the use of primary raw materials in the manufacture of semi-finished graphite products.

The EU-funded ICARUS project is pursuing the closure of material loops in the production of silicon wafers for the solar industry. Under this framework, SGL Carbon is examining ways to reuse recycled graphite from solar silicon processing in synthetic graphite applications. This long-term project is being realized in stages up to 2025 and is being funded by the EU under the Horizon Europe research and innovation funding program. An industrial implementation is planned from 2026.

The GS business unit is also looking at alternative carbon raw materials, including renewable raw materials and recycled sources. The goal is to replace fossil raw materials with sustainable alternatives and further reduce the company's environmental footprint. Implementation on an industrial scale is not expected before 2030.

Wood-based viscose materials are being used today as a precursor for the production of soft felt. This is now an established process.

A project in the Carbon Fibers (CF) business unit is developing CO₂-reduced 50k carbon fiber, which can contribute to the sustainable transformation of various industries. The main focus here is on reducing the carbon footprint and using renewable energy. Steam for the production process is generated using biomass, while the electrical energy required is obtained from renewable sources. Another factor in reducing carbon emissions is the use of "green" acrylonitrile from renewable sources, which allows for a further reduction in the carbon footprint.

SGL Carbon has a production capacity of 4,000 tons for the manufacture of CO₂-reduced carbon fiber. It expects demand-driven interest for these fibers from carbon-sensitive sectors such as the automotive and wind industries, which are increasingly focused on sustainable materials and could benefit from the CO₂ reductions in their products.

The Carbon Fibers business unit is also involved in the “Green Carbon” project sponsored by the Technical University of Munich, which is examining ways of obtaining “green” acrylonitrile from algae for use as a precursor for the manufacture of carbon fibers. SGL Carbon is evaluating the properties of the biologically based acrylonitrile and examining its suitability in volume production of carbon fibers. The first precursor material and carbon fibers from biologically based acrylonitrile were successfully produced back in 2022. Manufacturing of market-ready “green” carbon fibers is expected to commence in the second half of the present decade. The project is partly financed through government funding.

As a member of the Composites United e.V. association, the CF business unit also takes part in exchanges relating to resource-efficient carbon fiber production and the ongoing development of end-of-life recycling processes. SGL is already internally processing residual carbon fibers from production today for use in injection-molded materials, among other things.

Another focus is on reusing and recycling textile production residues from glass and carbon fibers that are processed by cooperation partners and used in new applications.

The Process Technology (PT) business unit repurposes production by-products for internal or external use. For example, graphite tubes damaged during production are reworked into column filling material. Graphite dust and chips resulting from mechanical processing are collected and used externally. The amount of resin systems used is being reduced through process optimizations. Reusable shipping crates are being utilized where possible.

By offering its customers installation, commissioning, inspection, maintenance and remote services, the PT business unit is ensuring optimal usage of equipment at all stages of operation and extending its service life. Operational efficiency at customers is being improved through regular maintenance and routine inspections.

The PT business unit takes a product design approach intended to ensure high reliability and durability and facilitate repairs and upgrades. This helps to reduce resource consumption throughout the product life cycle. PT also offers customers custom end-of-life solutions tailored to their specific requirements. These include refurbishment of equipment or further use of individual components and are intended to improve recyclability and reduce waste.

The Composite Solutions (CS) business unit has increased its development activities in the area of sustainable fiber composites since 2023. As part of a three-year research project, the CS business unit is working on developing a resource-efficient and recyclable battery housing. The project, a cooperation with a range of industry and research partners, is set to run until spring 2026.

Collaboration with various companies from the recycling industry for reprocessing fiber composite components has been continued and expanded to include new approaches. In the process, carbon and glass fibers are recovered for further use as reinforcement for injection-molded components or molding compounds.

SGL Carbon is involved in the recycloPreg research project, which aims to develop sustainable composite materials by combining natural fiber nonwovens with glass or carbon fibers and then reinforcing them through a bio-based resin system. Using a closed-loop recycling process, the materials are separated by solvolysis at the end of their life cycle to return the fibers and resins to the manufacturing process. The CS business unit is involved in manufacturing a demonstrator component and producing a life cycle assessment of the entire process in order to identify the CO₂ savings potential compared with conventional materials and processes. The project was launched in November 2024 and is set to run for three years.

In the Corporate business unit (Logistics), styrofoam linings for specific cardboard packaging have been replaced with recycled cardboard bags. This has helped to reduce the amount of packaging material containing plastic. Moreover, paper is now being used instead of plastic for packing slip envelopes; likewise in 2024, a system for reusing large wooden shipping crates was introduced at the Meitingen site.

In waste management, a software solution was implemented at the four German sites in Meitingen, Bonn, Wackersdorf and Willich that enables data collection, classification and tracking. The introduction of this software contributes to the optimization of waste management processes and increases resource efficiency through improved data availability. In the course of 2025, it is planned to extend the use of the software to the handling of hazardous waste (“electronic consignment note procedure”).

Targets related to resource use and circular economy (E5-3)

Up to the time of reporting, SGL Carbon has not yet set any results-oriented targets related to resource use and circular economy that are measurable across the Group. However, it does plan to set both circular economy and waste management targets by the end of 2027 at the latest.

To review the effectiveness of our strategies and actions related to resource use and circular economy, we track progress on projects for the use of circular raw materials in the business units' development departments. The sites also set specific waste targets, mostly regarding the implementation of waste-related actions. In Germany, the Circular Economy Act ("Kreislaufwirtschaftsgesetz", KrWG) stipulates the appointment of waste management officers at site level, who document the respective progress in their annual waste reports. Waste-related targets and actions are also reported on in accordance with the ISO 14001:2015 standard for the ISO 14001:2015-certified sites of Meitingen (SGL Technologies GmbH), Ried & Ort in Innkreis (SGL Composites GmbH) and Wackersdorf (SGL Composites Materials Germany GmbH).

Resource inflows (E5-4)

SGL Carbon is a manufacturing company. We source a large number of raw and other materials. Our material resource inflows include:

raw materials such as acrylonitrile and polyacrylonitrile (PAN) precursor for carbon-fiber production; cokes, pitches and natural graphite for graphite production; chemicals such as epoxy resins and different fiber types; equipment and system parts, including spare parts, consumables (process gases, chemicals, filters, cleaning supplies, non-metal consumables, laboratory supplies, lubricants, oils, adhesives); packaging materials (shipping crates, wood, pallets); IT equipment; tools and personal protective equipment (PPE); building and production equipment (furniture, electrical equipment); and water, which is mainly used for process cooling and is recycled.

Resource inflows	Unit	2024
Total weight of resource inflows	kt	112.2
Total weight of the products used	kt	79.7
Total weight of technical materials	kt	30.5
Total weight of biological materials	kt	2.0
Proportion of sustainably sourced organic materials ¹⁾	%	0.0
Reused or recycled secondary components, products and materials used in the manufacture of the company's products and services ²⁾	kt	2.4
Reused or recycled secondary components, products and materials used in the manufacture of the company's products and services ²⁾	%	2.1

¹⁾ Organic materials (and biofuels used for non-energy purposes) used in the manufacture of the company's products and services (including packaging) that are sustainably sourced, with information on the certification scheme used and the application of the cascade principle

²⁾ Including packaging

In the reporting period, the overall total weight of the products used and of the technical and biological materials was determined using the SAP purchasing data recorded in the Vendor Spend Report. The weight information was taken directly from the purchasing postings. Weight information from the material master data was used for items for which no weight information was available in the purchasing postings. Where it was not possible to determine the weight information using either of these approaches, an average weight was estimated based on the respective material group and purchase value.

The weight of the reused or recycled secondary components, products and materials (including packaging) used to manufacture the company's products and services was estimated as follows: The business units analyzed their purchasing processes and determined the recycled secondary components exclusively when purchasing steel. The share of recycled steel was estimated using regional steel recycling rates. Information was obtained from suppliers for some steel purchasing processes. To estimate the recycled share of the packaging materials acquired, regional recycling rates by packaging material group were used and applied to the company's procurement volume.

We record all of our material inflows in SAP and conduct analysis using our Vendor Spend Report (in SAP Business Warehouse). This report is based on our SAP system, where we

record all invoice entries. Individual items can be allocated to specific orders, goods groups and material numbers based on the invoice documents.

As part of collecting data on resource inflows, the volumes required are determined based on the goods receipt postings or the material master data in the SAP system. Estimates are used if no information on volumes is available in the system, with an average specific weight being assigned to the purchase value.

Double counting is avoided by using the Vendor Spend Report, which clearly differentiates each invoice.

Resource outflows (E5-5)

SGL Carbon strives to increase the share of recycled and reused materials in its products. By-products from production processes are reused internally wherever possible. The aim here is to ensure that materials from the first usage phase do not go unused but are reintroduced into the production cycle. If the by-products cannot be used internally, the company works with external partners to maximize their material or thermal recycling.

Given the specific requirements for our products and materials, the possibilities to fully design them according to the principles of the circular economy are technically limited. To date, there are only a few product lines where circular raw materials can be used and are also in demand by customers.

The company is working on recycling projects intended to increase the extent to which products, materials and waste are recirculated in practice after first use (see the Actions, E5-2 section).

SGL Carbon's waste management approach addresses both reducing resource use and optimizing resource efficiency. Responsible resource use is part of our environmental management framework. With this in mind, we monitor, separate and document our waste streams and introduce improvements to reduce our waste volume.

In cooperation with plant operators and operations managers, we develop actions based on the European waste hierarchy to prevent waste and ensure efficient resource use. This hierarchy prioritizes prevention of waste, followed by recycling and then disposal. Where

possible, we use equipment by-products as raw materials in other production processes to minimize waste and utilize the raw materials deployed to maximum effect.

If we cannot reuse these within operational processes, we look for alternative possibilities for material and thermal recycling. Materials resulting from construction activities are recycled to the extent possible.

The Corporate Environmental, Health and Safety Affairs (EHSA) corporate function conducts regular site audits to monitor compliance with legal and internal requirements. We also inspect the disposal facilities with which we cooperate to ensure proper and environmentally sound disposal.

Employee training is a further component of our waste management strategy. This covers our internal waste balance sheet, waste reduction projects, waste separation guidelines within the company and current legal requirements. At SGL Carbon GmbH in Germany, this training is supplemented by a manual that serves as a reference guide for the logistics and production teams and helps ensure legally compliant waste management. Our international sites observe the respective local laws.

SGL Carbon produces materials, products and solutions in four business units.

The GS business unit produces synthetic fine grain graphite blocks, expanded natural graphite, specialty graphites (some with high-purity coatings), graphite anode material and parts for fuel cells. Graphite materials are used in carburization during steel production as a recycling process.

The PT business unit produces process solutions and equipment, parts for corrosive applications, components and assemblies, and spare parts. Key components are often made from or with graphite or polytetrafluorethylene (PTFE). In particular, the incorporated steel content is recyclable. The graphite used in the business unit undergoes impregnation, rendering it unsuitable for recycling.

The CF business unit produces textile acrylic fibers, carbon fibers, nonwoven and woven textiles and pre-impregnated materials. Carbon fibers and textile acrylic fibers can be recovered as short-cut or ground material, a process termed downcycling.

The CS business unit produces composite components (in large- and small-scale production), friction linings for wet running and insulation materials. Carbon fibers in the components can be recovered through separation from the resin by solvolysis.

We normally use recyclable cardboard boxes and wooden crates as packaging.

SGL Carbon’s products are typically not designed based on circular principles.

Resource outflows	Unit	2024
Expected durability of the products marketed by the company in relation to the industry average		N/A ¹⁾
Repairability of products, if possible using an established evaluation system		N/A ²⁾
Recyclable content in products	%	56.2%
Recyclable content in packaging	%	94.0%

¹⁾ The company is not aware of any industry averages

²⁾ The company’s products are mostly materials, so repairs are not planned

SGL Carbon is not aware of any industry averages for the durability of the products it places on the market. It was therefore unable to compare the expected durability of the products it places on the market with the industry average for each product group.

The majority of SGL Carbon’s products are materials. Obviously, these cannot be repaired. In particular, the PT business unit conducts repairs on equipment and components, such as heat exchangers or pumps, which increases their service life.

The business units determined the rate of recyclable content in products by evaluating the recyclability of the product groups sold in the reporting year. They then totaled the sales volumes of all recyclable products and related this to the overall total weight of the materials used in the reporting period.

The rate of recyclable content in packaging was estimated using the following method: The packaging materials procured in the reporting year were divided into packaging material groups, and research was conducted to find industry information on the recyclability per group. The recyclable content was determined by totaling the recyclable content of all

packaging material groups and relating this to the total volume of all packaging material procured.

Resource outflows are posted in SAP. Within the individual posting transactions, the information collected includes the supplying plant, the materials themselves and the associated business unit and product line. Analysis is conducted in a consolidated dataset, the total of which corresponds to Group revenue. This rules out double counting in particular.

For posting transactions for which no associated weight could be assigned by the system, this was estimated by assuming an average revenue-specific weight.

SAP BW is used to record and assign waste volumes (see below). The amount of waste generated is recorded monthly at the company’s sites and assigned to the relevant waste categories. Disposal documentation from the commissioned specialist disposal companies is used for this. The figures for all sites are totaled in the SAP BW system.

Waste generation of hazardous and non-hazardous waste

Waste generation	Unit	2024
Waste quantities diverted from disposal		
Hazardous waste	t	741
Preparation for reuse	t	0
Recycling	t	158
Other recovery operation types	t	583
Non-hazardous waste	t	9,767
Preparation for reuse	t	0
Recycling	t	5,586
Other recovery operation types	t	4,181
Waste quantities diverted from disposal (total)	t	10,508
Waste for disposal		
Hazardous waste	t	2,288
Incineration	t	208
Landfill	t	1,085
Other disposal operations	t	996
Non-hazardous waste	t	14,430
Incineration	t	73
Landfill	t	6,473
Other disposal operations	t	7,884
Waste for disposal (total)	t	16,718
Total quantities		
Total amount of hazardous waste	t	3,029
Total amount of radioactive waste	t	0
Total amount of waste generated	t	27,226
Total amount of non-recycled waste	t	21,482
Percentage of non-recycled waste	%	78.9

The volumes of waste generated across the Group are broken down using criteria for recycling and disposal and into hazardous and non-hazardous waste to ensure their proper disposal.

SGL Carbon's typical waste includes materials such as industrial municipal waste, filter dust, packaging emptied of residues, used linings and fireproof materials, construction and demolition materials and chemicals (organic and inorganic).

The waste and materials contained therein differ across SGL Carbon's four business units.

Typical waste for the GS business unit includes materials diverted from disposal such as scrap wood, paper, glass, scrap metal, plastics, carbon black, machining sludges, mixed municipal waste, bulk waste, washing ethanol, waste oil, electronic waste, filter dust, green waste, phenol resin, operating materials containing oil, sodium sulfate and plastic with adhesive residues. Kiln bricks, insulation material, lime sludge, lime hydrate, packaging dust, green dust, acids and alkalies are directed to disposal.

Typical waste for the PT business unit includes materials diverted from disposal such as scrap wood, paper, glass, scrap metal, plastics, carbon black, machining sludges, mixed municipal waste, bulk waste, waste oil, electronic waste, filter dust and graphite debris. Contaminated graphite from machines, insulation material, acids and alkalis are directed to disposal.

Typical waste for the CF business unit includes materials diverted from disposal such as scrap wood, paper, glass, scrap metal, plastics, mixed municipal waste, bulk waste, waste oil, electronic waste, filter dust and carbon fibers. Resins, insulation materials and contaminated operating materials are directed to disposal.

Typical waste for the CS business unit includes materials diverted from disposal such as scrap wood, paper, glass, scrap metal, plastics, mixed municipal waste, bulk waste, waste oil, electronic waste, filter dust and carbon fibers. Resins, insulation materials and contaminated operating materials are directed to disposal.

The sites produce what are known as waste balance sheets, which serve as an internal control and planning tool. These sheets provide information on internally recorded waste, offering an overview of its nature and volume, disposal methods and waste-related costs.

The various waste fractions are systematically recorded based on records from daily operations and accounting documents, as well as the provided input registers for the disposal facilities; in the case of the German sites, they are amalgamated with the help of

a database to produce the waste balance sheets. The waste generated during manufacturing of salable products is considered, along with special effects from specific project activities.

SGL Carbon also records the waste volumes for all production sites worldwide in a database in SAP BW (Business Warehouse). The local EHS managers ensure this information is recorded each month. Corporate EHSA conducts plausibility checks. The data related to the volumes and how the waste is ultimately disposed of is based on documents from the commissioned disposal companies.

Information in Relation to Article 8 of the EU Taxonomy

In December 2019, the European Commission presented the “European Green Deal,” which includes the goal of making the European Union climate-neutral by reducing net greenhouse gas emissions in the European Union to zero by 2050. Achieving this goal will require action, such as redirecting private and public capital into environmentally sustainable activities. This required the development of the EU Taxonomy Regulation (EU 2020/852 or “EU taxonomy”), a classification system for defining environmentally sustainable economic activities.

For the 2021 fiscal year, companies that publish a non-financial report were for the first time required to provide information on taxonomy-eligible revenue shares, capital expenditure (capital expenditure, capex), and operating expenses (opex) in accordance with the EU taxonomy. SGL Carbon has been covered under this obligation since 2021 and so published this information for its taxonomy-eligible economic activities in 2021 in relation to the two published environmental objectives of climate change mitigation and climate change adaptation. The key figures have not yet been assessed in terms of their environmental sustainability for fiscal year 2021, as required by the EU taxonomy.

Starting in fiscal year 2022, legal requirements expanded reporting to include taxonomy-aligned economic activities. SGL Carbon is subject to this obligation. The necessary analyses were adjusted accordingly.

Also in 2023, the internal obligation to assess the taxonomy eligibility of environmental objectives 3 to 6 (sustainable use and protection of water resources, transition to a circular economy, prevention of pollution, and protection of ecosystems and biodiversity) applied for the first time. An assessment of taxonomy compliance for these environmental targets is required for the first time in the 2024 fiscal year and was therefore performed by SGL Carbon in 2024. The assessment took into account the Delegated Regulations (EU) 2021/2139, (EU) 2022/1214, (EU) 2023/2485, (EU) 2023/2486, and EU C (2023) 3850.

Determination of relevant taxonomy codes

For the 2024 fiscal year, SGL Carbon identified the following economic activities and products as taxonomy-eligible in connection with the climate change mitigation (CCM) goal:

Manufacture of renewable energy technologies (CCM 3.1). This includes carbon fibers for use in the wind industry and specialty graphite products for the wind industry (carbon brushes for wind turbine transmission and control).

The **Manufacture of batteries (CCM 3.4)** category includes the graphite anode material for lithium-ion batteries produced by the Graphite Solutions business unit, which is used in electromobility.

The **Manufacture of automotive and mobility components (CCM 3.18)** category includes fiber-reinforced composite battery housings for electric vehicles produced by the Composites Solutions business unit.

Production of heat/cool from bioenergy (CCM 4.24). This includes steam generation from biomass at the Carbon Fibers business unit’s Lavradio site.

In connection with the environmental objective of transforming to a circular economy (CE), the **Repair, refurbishment and remanufacturing (CE 5.1)**, and, within that, the service and repair services for heat exchangers in the Process Technology business unit were identified as taxonomy-eligible.

Additionally, the following economic activities will be reported in 2024 for the first time. In previous years, SGL Carbon had focused on evaluating and reporting on the materials produced by the Group and the associated costs. As a result, the following activities were previously outside the scope of the report but are now reportable:

Transport by motorbikes, passenger cars, and light commercial vehicles (CCM 6.5). This includes, in particular, company-leased vehicles (cars).

Taxonomy-eligible activities identified as part of the **Construction of new buildings (CCM 7.1)** activity include the construction of two production halls at the Meitingen (Germany) site for use by Brembo SGL Carbon Ceramic Brakes, a non-consolidated subsidiary, as well as the construction of production facilities in Bonn (Germany) and Saint Marys (US).

Renovation work at the Bonn (Germany) site was identified in the **Renovation of existing buildings (CCM 7.2)** activity.

No taxonomy-eligible SGL Carbon activities were identified under the environmental goals of adaptation to climate change, sustainable use and protection of water resources, prevention of pollution, and protection of ecosystems and biodiversity.

Determination of the taxonomy metrics

Reporting on the nature of taxonomy-eligible as well as taxonomy-aligned economic activities is carried out in accordance with the Taxonomy Regulation (EU) 2020/852. The metrics to be reported are the shares of taxonomy-eligible and taxonomy-aligned revenue, investments, and operating expenses. SGL Carbon does this using the reporting forms provided in Annex II of Regulation (EU) 2021/2178 and updated in Regulation (EU) 2023/2486.

The data collection is based on consolidated Group data. Double counting in the allocation of revenue, investments, and operating expenses is avoided. If data could not be clearly allocated when determining the metrics, suitable allocation keys were used.

The EU taxonomy defines **revenue** as net sales of goods or services including intangible assets. The share of revenue associated with taxonomy-eligible economic activities is divided by net sales. To determine the taxonomy-eligible revenue, the respective SGL Carbon products were allocated to the taxonomy-eligible economic activities. For the products identified in this way, the corresponding revenue with third-party customers for the 2024 fiscal year (numerator) was determined and compared to the revenue reported in the consolidated income statement (denominator).

Capital expenditures (capex) as defined by the EU taxonomy comprise additions to property, plant and equipment and intangible assets in the financial year under review before depreciation, amortization, and revaluations. In addition, there are cash inflows

from capitalized leases, to investment property, and to agricultural items; however, these three categories of expenditure do not exist at SGL Carbon. Taxonomy-eligible capital expenditures relate to assets or processes associated with taxonomy-eligible economic activities or that are part of a plan to expand taxonomy-aligned economic activities or transform taxonomy-eligible economic activities into taxonomy-aligned economic activities or that relate to the acquisition of products from taxonomy-aligned economic activities and individual actions that carry out the target activities in a low-carbon manner or reduce greenhouse gas emissions. SGL Carbon refers to capital expenditure on property, plant, and equipment and intangible assets (denominator). From this, the share of taxonomy-eligible capital expenditures is to be determined (numerator). For this purpose, the products identified via the taxonomy-eligible economic activities were related to the corresponding capital expenditures and, in addition, individual capital expenditures from the purchase of products from taxonomy-eligible economic activities and the implementation of individual measures to reduce greenhouse gas emissions were taken into account. The various taxonomy-eligible capital expenditures were compared to the investments reported in the Annual Report (see Annual Report, cash flow from investing activities).

Operating expenses (opex) as defined by the EU taxonomy comprise direct, non-capitalized costs relating to research and development and maintenance and repair, short-term leases and rentals, and the maintenance and repair of tangible and intangible assets. Taxonomy-eligible operating expenses relate to assets associated with taxonomy-eligible economic activities or that are part of a plan to expand taxonomy-aligned economic activities or transform taxonomy-eligible economic activities into taxonomy-aligned economic activities, or that relate to the acquisition of products from taxonomy-eligible economic activities and individual measures that carry out the target activities in a low-carbon manner or reduce greenhouse gas emissions (such as individual building renovations). SGL Carbon refers to expenses for maintenance and repair, rentals and leases, renovations, and research and development (denominator). For this, the share of taxonomy-eligible operating expenses is determined (numerator). For this purpose, the products identified via the taxonomy-eligible economic activities were related to the corresponding operating expenses and, in addition, individual operating expenses from the purchase of products from taxonomy-eligible economic activities and the implementation of individual measures to reduce greenhouse gas emissions or building renovations were taken into account. This metric is determined exclusively as part of taxonomy reporting as there is no equivalent to financial reporting KPIs defined elsewhere.

Verification of taxonomy alignment

To be considered taxonomy-aligned, an economic activity must satisfy the technical screening criteria (TSCs) as follows: it must make a substantial contribution to at least one of the six environmental objectives (satisfying the criteria in the Substantial Contribution section) and must not cause significant harm to the other five environmental objectives (satisfying the criteria in the Do No Significant Harm (DNSH) section). In addition, the minimum safeguards for occupational safety and human rights must be observed and respected.

First, the product portfolio of each business unit was reviewed with regard to the description of the activity according to (EU) 2021/2800 Annex I. For this purpose, business unit experts from sustainability, product management, development, and application technology were consulted. If there was agreement, the technical evaluation criteria were reviewed with the same group of experts with regard to a significant contribution to climate change mitigation and the transition to a circular economy. Environmental experts from Corporate EHSA were consulted for the subsequent review of “Do no significant harm (DNSH).” The results were recorded and documented.

In the 2024 fiscal year, capital expenditures were made related to the acquisition of products from taxonomy-eligible and taxonomy-aligned economic activities and individual actions that carry out target activities in a low-carbon manner or reduce greenhouse gas emissions. Verification of the alignment of this investment (capex (c)), including compliance with the minimum safeguards, must already be performed at the supplier level if SGL Carbon cannot answer the relevant questions itself. Questionnaires with relevant questions were sent to suppliers for this purpose.

Minimum safeguards

The minimum social safeguards for SGL Carbon as a whole were assessed across all activities as part of ensuring taxonomy alignment in accordance with Article 18 of the EU Taxonomy Regulation.

Minimum safeguards as defined by the EU taxonomy include the OECD Guidelines for Multinational Enterprises, the United Nations Guiding Principles on Business and Human

Rights, the International Labor Organization (ILO) Core Labor Standards, and the International Bill of Human Rights. As a signatory to the UN Global Compact and in its internal guidelines (SGL Carbon Code of Conduct, Human Rights Guideline, and Supplier Code), SGL Carbon is committed to respecting and protecting human rights and upholding the principles of the UN Global Compact, which are based on the above-mentioned sets of rules. SGL Carbon has introduced a Human Rights Management System, which is part of the overarching and certified Compliance Management System. For the elements of the Human Rights Management System, please refer to the chapters on respect for human rights, responsibility in the supply chain, occupational health and safety, and compliance management in this sustainability report.

Categorization of the following reporting templates

The following tables show the taxonomy-eligible (eligible) and taxonomy-aligned (aligned) portions of SGL Carbon’s revenue, capital expenditures, and operating expenses for the 2024 fiscal year in the presentation required by lawmakers (see Regulation (EU) 2021/2178, updated in Regulation (EU) 2023/2486).

SGL Carbon has no economic activities in the areas of fossil gas and nuclear energy within the meaning of the EU Taxonomy Regulation. Due to the scope of reporting templates 1 to 5 of the Delegated Regulation (EU) 2022/1214, they are not presented in tabular form since there is no taxonomy eligibility, and all reporting forms would therefore contain “no” or zero.

Outlook

According to Article 19(5) of the Taxonomy Regulation, the EU Commission will review technical assessment criteria on a regular basis or at least every three years in the case of activities that are considered transitional activities within the meaning of Article 10(2) of the Taxonomy Regulation. SGL Carbon will take any resulting adjustments to the Delegated Regulation into account in the future.

Template: Proportion of Capex from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Economic activities	Code(s)	Absolute Capex € million	Proportion of Capex % Y; N; N/EL	Substantial contribution criteria					DNHS criteria ('Does Not Significantly Harm')							Minimum safeguards Taxonomy-aligned or -eligible proportion of % Y/ N	Category (enabling activity) E	Category (transitional activity) T
				Climate change mitigation Y; N; N/EL	Climate change adaptation Y; N; N/EL	Water Y; N; N/EL	Circular economy Y; N; N/EL	Pollution Y; N; N/EL	Biodiversity Y; N; N/EL	Climate change mitigation Y/ N	Climate change adaptation Y/N	Water Y/ N	Circular economy Y/N	Pollution Y/N	Biodiversity Y/N			
A. TAXONOMY-ELIGIBLE ACTIVITIES																		
A.1. Environmentally sustainable activities (Taxonomy-aligned)																		
Capex of environmentally sustainable activities (Taxonomy-aligned) (A.1)																		
thereof enabling activity																		
of which transitional activity (T)																		
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																		
Manufacture of renewable energy technologies	CCM 3.1.	0.2	0.2%	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL									
Manufacture of batteries	CCM 3.4.	1.1	1.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									1.4%
Manufacturing of automotive and mobility components	CCM 3.18.	0.2	0.2%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									1.3%
Generation of heat/steam	CCM 4.24.	0.3	0.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									8.0%
Transport by motorbikes, passenger cars, and light commercial vehicles	CCM 6.5.	1.4	1.4%															
Construction of new buildings	CCM 7.1.	24.2	23.4%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									
Renovation of existing buildings	CCM 7.2.	2.1	2.0%	EL	N/EL	N/EL	N/EL	N/EL	N/EL									
Capex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		29.5	28.5%															10.7%
Total (A.1 + A.2)		29.5	28.5%															10.7%
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																		
Capex of Taxonomy-non-eligible activities		74.0	71.5%															
Total (A + B)		103.5	100.0%															

Capex: investments in intangible assets and property, plant and equipment plus additions to right-of- use assets

Template: Proportion of Opex from products or services associated with Taxonomy-aligned economic activities – disclosure covering year 2024

Code(s)	Absolute Opex	Proportion of Opex	Substantial contribution criteria							DNHS criteria ('Does Not Significantly Harm')							Taxonomy-aligned proportion of Opex, year N-1	Category (enabling activity)	Category (transitional activity)
			Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity	Climate change mitigation	Climate change adaptation	Water	Circular economy	Pollution	Biodiversity	Minimum safeguards				
	€ million	%	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y; N; N/EL	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	%	E	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES																			
A.1. Environmentally sustainable activities (Taxonomy-aligned)																			
Opex of environmentally sustainable activities (Taxonomy-aligned) (A.1)																			
thereof enabling activity																			
of which transitional activity (T)																			
A.2 Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities)																			
			EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL	EL; N/EL										
Manufacture of renewable energy technologies	CCM 3.1.	4.2	6.3%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							5.3%			
Manufacture of batteries	CCM 3.4.	4.1	6.1%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							10.9%			
Manufacturing of automotive and mobility components	CCM 3.18.	1.1	1.6%	EL	N/EL	N/EL	N/EL	N/EL	N/EL							3.7%			
Opex of Taxonomy-eligible but not environmentally sustainable activities (not Taxonomy-aligned activities) (A.2)		9.4	14.0%													20.0%			
Total (A.1 + A.2)		9.4	14.0%													20.0%			
B. TAXONOMY-NON-ELIGIBLE ACTIVITIES																			
Opex of Taxonomy-non-eligible activities (B)		57.7	86.0%																
Total (A + B)		67.1	100.0%																

Y: Yes, taxonomy-aligned activity that conforms to the relevant environmental objective
N: No, taxonomy-aligned activity, but not taxonomy-aligned with the relevant environmental objective
EL: "eligible," taxonomy-eligible activity for the respective target
N/EL: "not eligible," activity not eligible for taxonomy for the respective environmental objective

Proportion of turnover environmental targets

Abbreviation	Environmental target	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	Climate change mitigation	0.7%	7.0%
CCA	Climate change adaptation	0%	0%
WTR	Water	0%	0%
CE	Circular economy	0%	0.5%
PPC	Prevention and reduction of environmental pollution	0%	0%
BIO	Biodiversity	0%	0%

Proportion of Capex /total Capex

Abbreviation	Environmental target	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	Climate change mitigation	0.0%	28.5%
CCA	Climate change adaptation	0.0%	0.0%
WTR	Water	0.0%	0.0%
CE	Circular economy	0.0%	0.0%
PPC	Prevention and reduction of environmental pollution	0.0%	0.0%
BIO	Biodiversity	0.0%	0.0%

Proportion of Opex / Total Opex

Abbreviation	Environmental target	Taxonomy-aligned per objective	Taxonomy-eligible per objective
CCM	Climate change mitigation	0%	14.0%
CCA	Climate change adaptation	0%	0%
WTR	Water	0%	0%
CE	Circular economy	0%	0%
PPC	Prevention and reduction of environmental pollution	0%	0%
BIO	Biodiversity	0%	0%

Nuclear and fossil gas

Template Nuclear and fossil gas related activities

Row	Nuclear energy related activities	Yes/No
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	No
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	No
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	No
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	No
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	No

Own Workforce (S1) - Employee Matters and Respect for Human Rights

Information in relation to ESRS 2

The process to identify material impacts, risks and opportunities (double materiality) in relation to our own workforce can be found in the chapter “Procedures for assessing materiality” (IRO-1 and 2).

We consider our entire workforce in the materiality assessment, as well as in our final reporting. In this context, SGL Carbon has considered both the upstream and downstream value chain and its own business activities, including our products and services and their direct impacts on the workforce. Where information in our report refers only to parts of our workforce, we specify this in the relevant sections. Additional information on our business model and products can be found in the “Group Fundamentals” chapter of the Group Management Report 2024.

SGL Carbon’s workforce is composed of two main groups, employees and non-employees. Our employees are those who have a direct employment contract with SGL Carbon. This includes regular employees, interns, apprentices and working students, unless certain provisions expressly exclude this. It also includes employees in the United States who are in a voluntary employment relationship. Passive employees, such as those in partial early retirement (ATZ) in Germany or those on leave, are excluded, unless stated otherwise (see the additional information in section S1-6).

The second group includes non-employees, such as individual contractors supplying labor (“self-employed people”) and people provided by undertakings primarily engaged in employment activities (“third parties”). These non-employees include fixed-term employees, temporary employees and self-employed people. They work under the supervision of SGL Carbon and perform activities where SGL Carbon bears the risk, but are not in a direct employment relationship with SGL Carbon (see the additional information in section S1-7).

In its materiality assessment, SGL Carbon identified three positive material impacts on its own workforce. (See the chapter “Material impacts, risks and opportunities” – SBM-3). We did not identify any negative impacts or risks in relation to our workforce, regardless of their characteristics, activities or position. This is also the case for material impacts on our workforce from the transition plan. Further information on actions can be found in section S1-4 in this chapter. Where we report on activities that have positive impacts, we always refer to our entire workforce, unless expressly stated otherwise.

Strategies related to own workforce (S1-1)

SGL Carbon believes its success is largely based on the motivation and commitment of our employees and the strong cohesion within the workforce. We firmly believe that a values-based corporate culture based on respect, trust and a sense of responsibility is the basis for our long-term success. We therefore advocate for fair working conditions, respect for human rights and a safe, healthy working environment for all employees. These principles are firmly established in our corporate strategy and are designed to make positive social contributions and minimize potential risks for our employees.

SGL Carbon would like to address the material impacts, risks and opportunities affecting our workforce in a targeted manner. This relates in particular to health and safety, working conditions, equal treatment and opportunities (in this regard, also see the chapter “Material impacts, risks and opportunities” – SBM-3. SGL Carbon’s policies and guidelines generally apply to the entirety of our own workforce¹ worldwide and are binding on them.

Health and safety

Occupational health and safety is incorporated in our rules of conduct and our corporate strategy. We are responsible for creating a safe working environment for all employees. This is the core objective of our Group guideline on occupational health and safety and the basis on which we prevent, diminish and eliminate impacts and risks relating to health and

¹ The term “own workforce” always relates to SGL Carbon’s employees.

safety. A safe working environment is also essential for an undertaking's performance. In this regard, the Code of Conduct and the globally applicable EHSA Guidelines (Environmental Health and Safety Affairs) set out the requirements, guidelines and processes that are binding on all employees.

Regular feedback, training and the active participation of all employees serve to improve the health and safety of all employees on a continuous basis. The Board of Management is responsible for implementing the Group guideline, and all management levels and employees are responsible for complying with the same. In addition, we also use a Group-wide incident management system (based on the Incident Management Procedure) that serves to systematically record and investigate safety-related incidents and derive remediation actions whose effectiveness will subsequently be reviewed.

Working conditions

SGL regards fair, performance-based remuneration as a central work condition for all employees. Globally, SGL pays its employees salaries higher than the minimum remuneration deemed sufficient in the European Union. In Germany, for example, the industry collective agreement model ensures that the parties to the collective agreement find practical, industry-specific solutions on remuneration matters, among other issues. The methodology for determining what we consider to be a fair level of remuneration also includes the definition of activities and the measurement of their value. At the two largest SGL sites in Meitingen and Bonn, the vast majority of employees are bound by the collective agreement for the metal and electrical industry. The Board of Management, managing directors and Human Resources department are responsible for implementing the remuneration system.

Achieving work-life balance is not only in our employees' interests but is also an important means to increase our attractiveness as an employer. Opportunities for hybrid work and flexible work hours are essential conditions for work-life balance.

We offer employees working in administrative areas the option to work remotely in most countries with SGL sites (Germany, France, Italy, Austria, Poland, Portugal, Spain, United Kingdom), with the scope and conditions of this being established locally. Remote work has been introduced at individual sites in three countries (China, Japan, USA). The "Remote Work" general works agreement, implemented in Germany in October 2022, allows for flexible workplace arrangements in that country, covering up to 40% of working time in consultation with management, if allowed by the relevant position. Part-time working

models, as provided for in German law, for example, also allow employees to better balance their work and private lives.

Autonomy in choosing working time and flexible working time accounts are additional options available in Germany to make the allocation of working hours more flexible for individuals. At SGL, autonomy in choosing working time is available to all non-tariff employees in Germany. In other words, they are able to arrange their working time independently and flexibly, subject to statutory requirements and operational needs. This contribution to a trust-based working culture is regulated in a general works agreement. Working time accounts for tariff employees allow these employees to arrange their daily or weekly working time flexibly and are governed in local works agreements at German sites. Managing directors, managers with delegated entrepreneurial responsibility and Human Resources are responsible for the implementation of flexible working time.

Digitization is increasingly affecting employees' working conditions. The "Access for all" project has given all SGL employees at all sites worldwide access to the SGL PEOPLE Portal since 2024. Here, all employees can complete online training or apply for internal positions with just a few clicks. The aim here is to make SGL more attractive as an employer and to improve our digital offering. (Group) Human Resources is responsible for the implementation of this portal.

Working conditions are also influenced by SGL's corporate culture, which is based on common values. A group composed of the top management and selected employees identified five values in October 2022 that are essential for interaction and cooperation at SGL, namely: integrity and honesty; respect and appreciation; responsibility; trust; and passion for success. These SGL values were communicated across the undertaking immediately afterwards and are described in more detail in the "SGL Value Carta." The regular employee survey THE VOICE records the extent to which the workforce believes these values are being put into action. All employees and, in their role-model function, in particular the Board of Management, managing directors, all managers and Human Resources are responsible for implementing a values-based performance culture.

Diversity and equal opportunities

SGL Carbon's Code of Conduct and Human Rights Policy establish that any form of discrimination is prohibited. This expressly includes discrimination based on age, ethnicity, sex, pregnancy, national and social background, skin color, gender identity, disability,

genetic information, religion, ideology and sexual orientation. We also add that all other characteristics protected by German and European laws are covered by this protection against discrimination. Our Human Rights Policy lists additional characteristics, including marital status, physical features, participation in employee representation, membership of a union and voluntary activities. This list is not exhaustive, and it is further established that this protection relates to all grounds of discrimination that are inadmissible under applicable law. The Code of Conduct applies to us as an undertaking and also to each individual employee.

Human rights and compliance

SGL Carbon respects and supports the human rights of our employees, customers, suppliers, affected communities and all other interest groups. Our engagement extends to the implementation of in-depth due diligence processes in order to identify and mitigate actual or potential impacts on human rights. SGL Carbon is a global undertaking and is therefore exposed to human rights risks and impacts in all business units along the value chain. We are committed to ethical conduct both in our direct business activities and in our upstream and downstream value chains. This is established in our Group-wide Code of Conduct and in our Business Partner Code of Conduct.

In order to control and minimize our risks and impacts, we use a Group-wide management system to ensure observance of human rights in our own workforce. This system forms part of SGL Carbon's higher-level compliance management system, which is certified in accordance with ISO 37301.

As a signatory to the UN Global Compact and in its internal guidelines (SGL Carbon Code of Conduct, Human Rights Policy), SGL Carbon is committed to respecting and protecting human rights. SGL Carbon also upholds the principles of the UN Global Compact, based on the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, the International Labour Organization's (ILO) Core Labor Standards, and the International Bill of Human Rights.

Moreover, SGL Carbon adopted a statement of human rights principles in fiscal year 2024, which emphasizes SGL Carbon's commitment to respect for human rights, as reflected in other corporate guidelines. This is also in view of the fulfillment of the relevant requirement from the German Supply Chain Act (Lieferkettensorgfaltspflichtengesetz, LkSG), which has applied to SGL Carbon since January 1, 2024. This statement of human rights

principles expresses our expectations of the business activities undertaken by SGL Carbon, our subsidiaries, our business partners and suppliers as regards human rights and environmental rights, and describes the due diligence measures taken in the scope of the risk management set out by the LkSG.

The Human Rights Policy, which has been effective since 2018 and was updated in fiscal year 2023, underwent a further fundamental revision in fiscal year 2024. While the previous version of the Human Rights Policy focused in particular on the human rights aspects at work relevant to SGL's workforce as the target group ("Respect in the Workplace," "Diversity in the Workplace," "Working Conditions" and "Complaints Procedures") and merely gave a summary of universally applicable human rights, the revision in 2024 added greater detail to several chapters, including "No Child Labor," "No Forced Labor," "Freedom of Assembly," and "Working Time and Working Conditions," as well as sections on "Occupational Health and Safety," "Environmental Protection," "Interaction with Security Workers" and "Engaging with Local Communities and Indigenous Peoples". This revision was carried out in particular to increase all employees' awareness of these fundamental human rights. The Human Rights Policy is available in all nine SGL languages and has been made available to all SGL employees globally on the SGL People Portal. Employees can digitally confirm that they have read and accept the policy on the portal, as well. The policy was made available digitally on November 13, with administrative employees given three weeks to read and accept the policy, and production employees given until January 31, 2025, to read and accept the policy in light of the higher administrative burden for this target group. There was a response rate of 97% for all administrative employees on December 31, 2024. In spite of the additional time available to them, production employees had achieved a response rate of 43% by this time (this figure has not been validated externally). The Human Rights Policy is also included in recruitment documentation for new employees at all SGL sites. It is made available digitally.

The Board of Management of SGL Carbon created the function of a Human Rights Officer in 2023 who reports directly to the Board of Management and commissioned the Head of Group Compliance to perform this role for SGL Carbon. This further demonstrates the importance of human rights to SGL Carbon and its employees and is also the result of the steadily growing requirements for monitoring compliance with due diligence obligations to respect human rights in its own business unit and along the value chain. The Human Rights Officer keeps the Board of Management constantly updated on the state of

implementation of human rights due diligence obligations in accordance with the statutory requirements set out in the LkSG.

SGL Carbon aims to protect and support the human rights of all employees to the fullest extent. We follow recognized international standards such as the Universal Declaration of Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct, the UN Global Compact and the UN Guiding Principles on Business and Human Rights (UNGPs).

Moreover, SGL Carbon has implemented a complaints procedure which ensures an immediate and appropriate response to any indications of possible human rights violations. The same reporting channels are available for reporting such instances as are used for other compliance violations.

These policies and management approaches reflect SGL's core values and reflect its commitment to protecting human rights and strengthening a responsible corporate culture. They aim to ensure that SGL not only meets international standards, but also creates a safe, inclusive and supportive working environment for all employees.

Targets and actions related to own workforce (S1-4, S1-5)

SGL Carbon has identified three key impacts in relation to its own workforce: the promotion of the well-being and prosperity of its workforce and, by extension, the public. SGL Carbon takes a variety of targeted actions to support these positive impacts in the long term.

Health and safety

The prevention of accidents at work increases the safety of our employees in the workplace and will also have positive impacts on health and public well-being. To prevent accidents at work, SGL Carbon uses a Group-wide safety management system that has an integrated, uniform procedure for all incidents, including smaller accidents and serious near misses. All accidents are to be recorded in the Group-wide safety management system. The incidents are recorded (incident notification), investigated, classified by severity and reported to the responsible person in a systematic process. Suggestions for improvement are derived and consideration is given to which solutions have already proven effective in preventing accidents (incident report).

Once a month, the central corporate EHS unit (Environmental Health and Safety department) provides the Board of Management of SGL Carbon, the heads of the business units and sites, and the EHS managers (Environmental Health and Safety managers) with a safety report and relevant statistics (HSE report). In addition, weekly reporting is carried out Group-wide to track the current safety situation with detailed information on new accidents (employee safety status).

This process serves to check and ensure compliance with the Occupational Health and Safety Directive. Countermeasures are to be taken immediately in the event of negative developments or violations. At the same time, the applicable safety measures and precautions have been refined to prevent accidents.

In an EHS incident review, the central corporate EHS unit and local EHS managers also discuss overarching issues on a monthly basis. This is to ensure that all legal and SGL-internal regulations are complied with and that corresponding systems are established at each site. In 2024, discussions were held to present and analyze accidents resulting in lost time, including the causes of accidents and corrective actions, as well as eight near misses and 11 best practice examples.

In addition, the central EHS unit, in cooperation with the local EHS managers, conducts internal audits that also evaluate, inter alia, the implementation of the Group-wide occupational health and safety standards and their advancement. EHS audits also include compliance with energy and environmental standards. As a rule, the sites are inspected by the central corporate EHS unit every three years, or more often if incidents have frequently occurred at any given site. Four SGL sites were audited in 2024.

The global EHS team reports to the HSE Council (Health and Safety Council) three times a year and provides updates on recent developments and site-specific actions. The HSE Council is composed of the members of the Board of Management of SGL Carbon, the heads of the business units and central corporate units and the global corporate EHS team, with the Chairperson of the Board of Management also serving as Chairperson of the HSE Council. This body is responsible for monitoring and controlling occupational health and safety measures.

To achieve the occupational health and safety targets, and therefore also to effectively manage our impacts, risks and opportunities, SGL Carbon uses a variety of incentive

schemes that actively involve employees in accident prevention and that take their ideas to eliminate accident risks into account. At the Bonn, Meitingen, Limburg, Wackersdorf and Willich sites, 390 suggestions for improving safety were submitted in the scope of the ideas management process, 261 of which were found to be valuable, with 173 of these now processed and completed. The remaining 88 are currently being implemented.

A safety award is also presented annually to sites where there have been no accidents in the last three years. 16 sites received this award in 2024. To further raise awareness of occupational safety throughout the workforce, a Group-wide Safety Day was held again in 2024, with active participation also by the Board of Management and management team.

A further important measure to support our positive impacts in occupational health and safety is employee training. Training is provided not only by EHSA experts but also by local managers who are required to train and support employees in their areas of responsibility regarding safety issues.

To deal with positive and negative impacts and the risks associated with process safety and any accidents resulting therefrom, SGL Carbon has had a globally applicable Process Safety Policy and has maintained a process safety system since 2017. The system includes a variety of different components, such as process safety analyses, accident investigations and countermeasure control. In addition, each accident must be recorded, analyzed and classified in the above-mentioned incident management system. This is done to determine whether an incident occurred in occupational health and safety or process safety.

SGL Carbon uses a uniform Group-wide risk management system to identify and, if necessary, minimize risks in its production processes. This involves analyzing the extent and hazard potential of crisis events and calculating their economic consequences – such as the costs of eliminating environmental harm or loss of sales revenue due to production downtime. For each primary risk, one or more risk mitigation measures were identified and will be initiated if necessary.

SGL Carbon conducts annual reviews in cooperation with a property insurance company. This involves subjecting many processes and plants to a safety analysis that primarily focuses on fire control and protection as well as operational interruption. The results are evaluated and documented. Specific measures for improvement are drawn up if necessary. A total of seven sites were assessed in 2024.

With its business partners, SGL Carbon also places great importance on appropriate standards for occupational health and safety and compliance with applicable laws in order to have a positive effect on the health and well-being of society. The Business Partner Code of Conduct requires partners to ensure the health and safety of employees in all workplaces and to establish a management system for continuous improvement. All relevant suppliers also receive an online questionnaire for purposes of reviewing various sustainability matters (also see the chapter “Business Conduct” G1-2). This questionnaire also covers occupational health and safety matters.

Working conditions

SGL Carbon is committed to its employees’ well-being. This commitment is reflected in our actions, which aim to contribute to a positive working environment and positive working conditions for employees. Flexible work, fringe benefits such as company pensions or bicycle leasing, and targeted support for young managers and talents shape SGL’s corporate culture. Employees in several countries, including Austria, China, Germany and France, often receive performance reviews.

SGL Carbon places great importance on fair remuneration for employees worldwide, which is based on the national minimum wage in the relevant location². A large proportion of employees in Germany is employed under collective agreements, which promotes a stable, fair work environment. Moreover, some employees also benefit from additional company pension options that supplement public pension schemes and guarantee long-term financial protection. All SGL Carbon employees (100%) therefore received remuneration in

² Interns and apprentices are not considered part of the group of employees. The statutory minimum wage or collective agreement in force in the region was used as a comparative figure. The data was collected in a global data survey. The figures in the “Working Conditions” section have not been validated by an external body.

reporting year 2024 that we believe was adequate and in line with the relevant benchmarks for each site.

The fringe benefit of bicycle leasing was introduced in Austria in 2023 and Germany in 2024. There is a comparable program in the United Kingdom. In addition, there are corporate benefits available in Poland, Austria and Germany that allow employees to purchase a range of consumer goods and services at a discounted price. In the United States, SGL Carbon offers a catalog of benefits that employees can choose from, including pension plans, paid leave and health care. There are company pension schemes available in Germany, specifically defined contribution plans for all employees and an additional plan for management levels.

Diversity and equal opportunities

Professional training plays an important role at SGL Carbon. We offer training courses in technical and commercial professions in four countries (Germany, Austria, the United Kingdom and Poland) and internships for students in Germany.

The SGL Carbon PEOPLE Portal provides all employees worldwide access to digital training and gives them the option to acknowledge corporate guidelines electronically, where required.

We introduced the top talent program in 2021, which is aimed at employees with medium- to long-term management potential and targets the development of future senior managers. The Leadership4Performance program was also introduced in 2024, which is a 15- to 18-month program designed for middle management that combines various learning formats and focuses on modern management skills. Two groups with 14 participants each took part in this program in reporting year 2024.

These targeted actions allow SGL to create a work environment that supports the development of our workforce while also increasing their motivation. Our policies and programs apply to all groups of employees at SGL Carbon and reflect our strategic commitment to sustainable working conditions. We use various means to review the effectiveness of these actions globally, including employee surveys. The five KPIs – Performance Culture Index, Value Index, Engagement Index, Leadership Effectiveness Index, and Net Promoter Score – are analyzed in particular over time. The Board of Management, managing directors, managers and Group Human Resources are responsible for the aforementioned actions.

Human rights and compliance

SGL Carbon endeavors to respect and observe human rights and increase public well-being through its Group-wide strategies, actions and targets.

Building on the Human Rights Risk Analysis, which was first introduced in 2019, a Human Rights Impact Risk Assessment was performed for all SGL sites and operating companies using the Integrity Next platform in 2023. This risk analysis took account of the requirements set out in paragraphs 2 to 4 of the German Supply Chain Act (LkSG), with a view to assessing the human rights and environmental risks in SGL's business. The assessment includes an abstract and a specific risk analysis. The abstract risk analysis is based on stored country and industry risks and an automatic score is determined by the Integrity Next platform by inputting the site and NACE code. This abstract risk analysis was supplemented by a specific risk analysis covering occupational health and safety, the environment, handling hazardous substances, human rights, diversity and equal opportunities and remuneration. For each topic, Integrity Next had defined a catalog of questions based on the requirements of the LkSG and other international standards. These questions were then answered on the online platform by the respective local compliance representatives (LCRs) with the support of other responsible persons from the competent local EHSA (Environmental Health and Safety) and Human Resources departments. Group Compliance initially reviewed the assessment centrally in fiscal year 2024, and expert interviews were subsequently carried out with Group HR and Corporate EHSA. These expert interviews served to analyze and verify the results at individual sites and take account of other findings. A catalog of actions was drawn up on the basis of these interview rounds, which was presented as part of the annual report to the Board of Management on SGL Carbon's compliance with the corporate due diligence obligations arising from the LkSG at the meeting held on October 7, 2024.

Group Compliance and Group HR centrally developed a training policy on observance of human rights in 2023 for all employees in administrative areas (office workers), as well as for employees in production areas. The policy was discussed with local compliance representatives at regional compliance conferences, with local input obtained. Building on this, training documentation was prepared in all nine SGL languages in the first half of 2024. The training serves to raise awareness among employees of the protection of human rights in the workplace and demonstrate how each individual can make a contribution with their conduct and prevent inappropriate conduct. The training policy provides for a two-step learning concept, comprising online training on the Code of Conduct, including a chapter

on human rights and in-person human rights training. The online training is available to employees on the SGL PEOPLE Portal in all nine SGL languages. The in-person training comprises a central video message from the SGL Human Rights Officer and various practical cases that participants work through together. The training is carried out locally and is managed by the relevant LCR.

The risk assessment carried out for our sites using Integrity Next did not identify any critical issues. Sites where “critical” substances or hazardous substances are used were assessed as higher risk in the expert interviews. Additional controls have been added at these sites to supplement the existing measures, in line with a risk-based approach from the LkSG. This procedure serves as additional prevention in the area of Environmental Health and Safety (EHSA). Potential risks relating to the employment of minors were also examined in more detail. The analysis showed that no SGL sites worldwide have employees under the age of 18, apart from in the scope of training programs that are subject to strict legal requirements.

There are currently no plans to repeat the Integrity Next assessment as a low level of human rights risk was identified at the SGL sites. Instead, the assessment will be integrated into existing measures in the future. This will include, for example, an expansion of the EHSA audit catalog for regular audits to include questions from the Integrity Next assessment. The LCR compliance questionnaire, which already covers various matters from the ILO Labor Standard, has also been extended. This ensures that sites regularly report on human rights matters.

Actions to regulate impacts, risks and opportunities

Targets related to own workforce

We have set the following targets to support our positive impact on the health, well-being and prosperity of our own workforce and the economic growth in society:

Targets for occupational health and safety (incl. S1-14)

SGL Carbon aims to promote the health of our workforce and provide workplaces and processes that prevent work-related injuries and ill health. We have set ourselves specific targets to manage and support material impacts and minimize material risks in the context of occupational health and safety for our own workforce. These targets measure the success of our actions and our progress. We aim to reduce our lost time incident frequency

rate (LTI FR) by 5% annually by 2025 compared to the base year 2022 and continuously improve the existing safety measures. We include all lost time incidents (Tier 4 and Tier 5 accidents) in the calculation of the LTI frequency rate across SGL.

In recent fiscal years, we have succeeded in reducing our lost time incidents (LTI – accident-related absence of employees and temporary workers) per million hours worked each year. In 2024, SGL Carbon achieved an LTI frequency rate of 1.5 (voluntary disclosure in accordance with ESRS 1.114), well below the target value of 2.2.

The LTI frequency rate is calculated each week by Corporate EHSA (Environmental Health and Safety) and is reported weekly on target achievement at Group and business unit level.

We have adapted the calculation in line with the definition in ESRS S1-14 (88)(c) and also state the number and rate of work accidents in this report in accordance with these requirements. There were 94 work accidents pursuant to ESRS S1 (88)(c) – i.e., accidents where medical treatment was required beyond first aid measures (Tier 3, 4 and 5) – in reporting year 2024, corresponding to a rate of 12.1 (accidents per million hours worked).

On the local level, the topic of occupational health and safety is included in individual annual targets of many sites. But even when we look beyond the local sites, the topic of occupational health and safety is specified as a target figure of the variable compensation structure for the four management levels below the Board of Management (see also the “General Disclosures” chapter in the “Governance” section).

Targets for diversity and equal opportunity

To measurably support diversity and equal opportunities at SGL Carbon, we have set ourselves the quantitative target of maintaining the percentage of women in upper management positions at 20%. The Board of Management is responsible for achieving this target.

To allow us to observe the development of the values-based SGL performance culture, it has been our target since 2022 to continuously improve the SGL Performance Culture Index and achieve a result defined as “good.” Responsibility for implementation lies with the Board of Management, managers and Group Human Resources. All employees worldwide are also responsible for developing the performance culture and therefore also achieving the defined target.

Targets for human rights and compliance

Following the implementation of the global training policy on observance of human rights for all administrative employees, which saw 2,532 employees receive training, the human rights online training sessions are now an integral part of the mandatory compliance training for all new administrative employees. The online training, which is available in a total of nine SGL languages, is available to the target group via the internal SGL PEOPLE Portal. Virtual training was also provided via MS Teams in 2024.

Online training on the Code of Conduct including human rights for production employees was rolled out at US sites from March 2023 and all other sites from January 2024. By the end of the year, 2,589 production employees, or 95% of the total, had completed the training worldwide.

In-person training on human rights was also launched for production employees in reporting period 2024, which supplements the basic training and is the second part of the human rights training policy. The roll-out is gradual, starting in the United States, with Asia and Europe following, and will continue throughout 2025. The sites in the Carbon Fiber business unit are currently exempted from this in-person training. By the end of the year, 325 employees or 88% of the target group in the United States, 252 employees or 92% of the target group in Asia, and 492 employees or 95% of the target group in Europe (excluding Germany) had attended the training. The training will start at the participating German sites in 2025.

The strategic targets for SGL's own workforce (ESRS S1) are defined with the Board of Management as the central stakeholder. The process for setting targets specifies that targets are initially drawn up by the relevant departments. The targets are then discussed and agreed upon by the heads of Group HR, EHSA, Compliance as part of the overall ESG strategy and Corporate Sustainability. Targets for individual areas covered by the ESRS S1 Standard are then presented to SGL Carbon's Board of Management and discussed. The targets are confirmed once they are subsequently approved by the Board of Management.

Any progress made toward these targets is regularly evaluated and analyzed at the ESG Steering Committee's meetings and, where necessary, actions are agreed and implemented to ensure the targets are achieved. The performance is also analyzed at the ESG Steering Committee's meetings together with the responsible managers, and remediation actions are implemented where required.

Processes for engaging with own employees and employee representatives (S1-2)

Involvement and dialog with the workforce

We maintain a continuous dialog with our workforce and promote open communication at various levels with a view to ensuring continued positive impacts on our workforce and meeting our employees' needs.

- **Management dialog:** a monthly exchange format for non-tariff employees in which managers and employees make time for a targeted exchange of information, feedback and joint solutions to challenges.
- **Social dialog:** SGL Carbon maintains a social dialog with employee and union representatives where possible and legally required. We work in accordance with local statutory requirements and the applicable collective agreements in all countries in which we operate. Our aim is to operate at all our sites worldwide in line with the relevant state and national laws, locally applicable collective agreements and regulations governing operations and industrial relations. Where required, a social dialog takes place at least once a year with employee and/or union representatives at SGL production sites worldwide in accordance with the local applicable laws.
- **Global employee survey "THE VOICE":** SGL Carbon maintains a dialog with its employees and has conducted the global, anonymous, electronic survey known as "THE VOICE" regularly since 2022. This survey was initially conducted three times in six-monthly intervals between the fourth quarter of 2022 and the fourth quarter of 2023 before it was conducted again in the fourth quarter of 2024 after an 11-month break. THE VOICE is scheduled at least once a year from 2024 and provides a valuable insight into the organizational and performance culture. The survey aims to measure the implementation of the SGL values and the development of the desired performance culture. A central indicator of success in this regard is the Performance Culture Index, which covers the three aspects "Living the SGL Values," Employee Engagement," and "Leadership Effectiveness." The results of the survey serve as a starting point for targeted remediation actions that can be initiated and implemented by managers and employees together, always in compliance with locally applicable laws. The improvement initiatives developed based on the results of the THE VOICE survey should have a positive

impact on the results of the next surveys. The findings of the survey over the course of time are therefore a means of measuring the effectiveness of workforce engagement.

If a reduction in carbon emissions and the transition to more environmentally friendly and climate-neutral activities impacts our workforce, we will inform the employee representatives and employees at the relevant sites as needed, in accordance with the locally applicable laws. There are various channels for this, such as in a works meeting or via the SGL Intranet. There were no such impacts in reporting period 2024.

Part of the organizational structure of SGL Carbon SE as a European company (Societas Europaea, SE) is the establishment of an SE works council. The general purpose of the SE works council is to offer a forum for informing and consulting employee representatives in material cross-border (EU) matters. SGL Carbon SE recognizes a works council for Societas Europaea for countries within the European Union.

As the main purpose of the SE works council is to act as an EU-wide consultation body, it is composed of employee representatives from EU Member States with SGL employees. The SE works council has 11 members from five countries and member representatives for the term 2021–2025. The details of the SE works council's responsibilities are defined in the involvement agreement which was signed by the SE works council and the undertaking in February 2018.

The managing directors of the individual legal entities, the relevant HR managers and social partners are responsible for the social dialog. As outlined in section 10 of the SGL involvement agreement, the Board of Management of SGL Carbon SE is responsible for informing and consulting the SE works council on the development of the business situation and the SGL Group's prospects in an annual meeting.

Our overarching Human Rights Policy applies worldwide and is binding for all employees. (In this regard, see also the section "Strategies related to own workforce" – S1-1).

Processes to remediate negative impacts and channels for own workers to raise concerns (S1-3 and S1-17)

SGL Carbon implemented a global whistleblower system as early as 2014, which employees, managers, and company outsiders can use to report possible violations of the law. SGL's whistleblower system can also be used to report possible human rights violations or potential human rights or environmental risks, whether in SGL Carbon's own business or in our supply chain. Details on SGL's whistleblower system and complaints process are described in the "Business Conduct" – G1 chapter in the section "Strategies relating to business conduct and corporate culture" – G1-1.

In fiscal year 2024, 10 of the 14 submissions received at the confidential central reporting office were complaints concerning human rights and the Code of Conduct (for example, possible discrimination or potential violations of our values-based conduct and management principles). In two cases the accusations were confirmed following an internal investigation and punitive action was taken commensurate with the severity of the violation. In seven cases, an internal investigation could not confirm the violation, while one case is still being investigated.

SGL Carbon is not aware of any complaints submitted against SGL Carbon to the OECD's National Contact Point for Multinational Undertakings.

Characteristics and metrics for SGL Carbon's employees (S1-6 to 16)

Characteristics of the undertaking's employees (S1-6)

All active employees at SGL Carbon are included as "employees" as defined by the disclosure requirements set out in ESRS S1, including apprentices and interns who are employed for training purposes. Although apprentices and interns are not considered active "employees" under the laws of some countries, we include them for transparency reasons, but report them as a separate group in the total. Consequently, most passive employees (e.g., employees on leave, partial early retirement in Germany) are not included

in the employee numbers. Passive employees were only included in order to calculate the turnover rate as they also leave the undertaking (after the end of the release phase in partial early retirement, for example).

The second exception is ESRS S1-10 “Adequate Wages” and S1-16 “Gender Pay Gap,” where we have excluded apprentices and interns. The number of SGL employees is reported as a headcount.

The data is extracted from our global SAP SuccessFactors HR platform that we call our SGL PEOPLE Portal. We manage data sets for all employees. The data is extracted to ensure that we have a “frozen” data set for consistent reporting. The headcount at year-end is used where we describe the status at a certain point in time. If an average value is requested or required, for example to calculate a percentage, the average value is calculated as the mean headcount on the last day of each four quarters.

	Dec 31, 24	Average ¹⁾
Number of employees (headcount)	4,511	4,626

¹⁾ Average provided in addition to year-end headcount as it is used in subsequent calculations

Number of employees (headcount) by gender¹⁾

Gender	Dec 31, 24
Female	816
Male	3,695
Other	0
Undisclosed	0
Total employees	4,511

¹⁾ Gender as self-reported by the employees

Region	Country	Number of employees (headcount) per country Dec 31, 24	Number of employees (headcount) per region Dec 31, 24
Germany	Germany	2,052	
Europe excluding Germany	United Kingdom	188	
	Austria	255	
	France	241	
	Portugal	295	
	Spain	40	
	Italy	24	
	Poland	189	
Total Europe			3,284
North America	United States	754	754
China	China	414	
Rest of Asia	Japan	48	
	Korea	3	
	Malaysia	2	
	Taiwan	6	
Total Asia			473
Total		4,511	4,511

Employees in our US subsidiaries are employed on an at-will basis (offer and agreement with no defined hours), as is customary in the United States. For SGL Carbon they are considered full-time employees, even if their weekly working hours are not formally defined in a contract.

Number of employees by contract type and gender¹⁾

	Female	Male	Other	Undisclosed	Total
Number of employees (headcount)	816	3,695	0	0	4,511
Number of permanent employees	776	3,501	0	0	4,277
Number of temporary employees	40	194	0	0	234
Number of non-guaranteed hours employees	0	0	0	0	0

¹⁾ Gender as self-reported by the employees

Employee Turnover

	Number of employees 2024	Percentage ¹⁾ 2024
Total	729	15.39%

¹⁾ Number of employees who left the undertaking divided by average headcount (including passive employees)

In the notes to our financial reports we use the average number of employees as prescribed by the German Commercial Code (HGB). The average is the mean, which is calculated by adding the four quarters together then dividing by four.

Characteristics and metrics for non-employee workers in SGL Carbon's own workforce (S1-7)

Non-employees are defined as individual contractors supplying labor to SGL Carbon ("self-employed people") and people provided by undertakings primarily engaged in employment activities ("third parties"). This includes temporary workers, contract workers and self-employed people.

Number of non-employees¹⁾

	FTE
Total	193

¹⁾ Calculation based on December values

Data on non-employees is recorded in full-time equivalents (FTE). We use local full-time equivalence as full time hours differ by site and shift plan. These figures are recorded at the end of the reporting period for the last month of the year, ensuring the accuracy and reliability of the reporting process. Data was requested globally from SGL Carbon sites to collect the data for this data point, with the relevant country/site managers in HR providing the relevant information.

Collective bargaining coverage and social dialog (S1-8)

Coverage	Collective bargaining coverage		Social dialog
	Employees – EEA ¹⁾	Employees – Non-EEA ²⁾	Workplace representation (EEA only) ¹⁾
0–19%		China	
20–39%		USA	
40–59%			
60–79%		UK	
80–100%	Austria, France, Germany, Poland, Portugal		Austria, France, Germany, Poland, Portugal

¹⁾ For countries with >50 employees representing >10% total employees

²⁾ Estimate for regions with >50 employees representing >10% total employees

Overall, 65.8% of all employees were covered by collective agreements.

Data was requested globally from SGL Carbon sites to collect the data for this ESRS data point, with the relevant country/site managers in HR providing the relevant information. All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, including apprentices and interns who are employed for training purposes.

Diversity metrics (S1-9)

Employee age distribution

Age group	Number of employees (headcount)	Percentage of employees
<30 years	642	14.23%
30–50 years	2,492	55.24%
>50 years	1,377	30.53%

All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, including working students, apprentices and interns who are employed for training purposes. The headcount as at year-end was used.

Top management by gender (Dec 31, 24)

	Female	Male	Other ¹⁾	Undisclosed	Total
Number	18	67	0	0	85
Percentage	21.18%	78.82%	0.00%	0.00%	100.00%

¹⁾ Gender as self-reported by the employees

SGL currently defines positions from management group 3 and upwards as top management. This primarily includes the heads of central functions, heads of business units, heads of larger sites and heads of larger legal units.

Adequate wages and social protection (S1-10, S1-11 and S1-12)

Globally, SGL pays its employees salaries higher than the minimum remuneration deemed sufficient in the European Union. For further details, see the section “Strategies related to own workforce” – S1-1.

Percentage of employees paid below applicable adequate wage benchmark

Country	Percentage
None	N/A

Data was requested globally from SGL Carbon sites to collect the data for this data point, with the relevant country/site managers in HR providing the relevant information. All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, including apprentices and interns who are employed for training purposes. The statutory minimum wage or collective agreement applicable in each region was used as a benchmark for appropriate wages. Furthermore, the headcount as at year-end was used. We did not ask employees about their disabilities in consideration of personality rights and legal restrictions.

Social protection by country

Country	Sickness	Unemployment ¹⁾	Employment injury ²⁾	Parental leave	Retirement
Germany	All	All	All	All	All
United Kingdom	All	All	All	All	All
United States	All	All	All	Unpaid in most cases, some exceptions e.g. in California	All
Austria	All	All	All	All	All
France	All	All	All	All	All
Portugal	All	All	All	All	All
Spain	All	All	All	All	All
Italy	All	All	All	All	All
Poland	All	All	All	All	All
China	All	All	All	All	All
Japan	All	All	All	All	All
Korea	All	All	All	All	All
Malaysia	All	All	All	All	All
Taiwan	All	All	All	All	All

¹⁾ Unemployment starting from the day employees leave the company

²⁾ Employment injury and acquired disability

“All” refers to all employees who satisfy the eligibility criteria set out in local legislation. This may include contributions to the social security system, citizenship and attendance at mandatory appointments at public offices. All employees concerned are generally eligible.

Public programs or benefits offered ensure that all employees in SGL’s own workforce have social protection against loss of income resulting from illness, unemployment, accidents at work, disability and retirement. Public programs or benefits offered ensure that all employees in SGL’s own workforce – apart from those in the United States – are protected against loss of income resulting from parental leave. Entitlement to parental leave in the United States is limited with regard to social protection through public programs. Employees are protected for the period of “inability to work,” which is defined by a medical certificate and is generally the six to eight weeks following the birth of a child.

Training and skills development metrics (S1-13)

Percentage of employees who participate in regular performance and career development reviews (fiscal year 2024)¹⁾

Female	73.3
Male	70.2
Other ²⁾	0
Undisclosed	0
	70.8

¹⁾ Due to incomplete data, the total number of performance and career development reviews collected are allocated based on group gender distribution

²⁾ Gender as self-reported by the employees

Data collected following a global data request was used to record the performance reviews.

All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, including apprentices and interns who are employed for training purposes. The average headcount as of the quarter-end dates was used.

Average number of training hours per employee (fiscal year 2024)¹⁾

Female	12.77
Male	17.94
Other ²⁾	N/A
Undisclosed	N/A
	16.7

¹⁾ Due to training hours being incomplete nor allocated to individuals, the total training hours collected are partially allocated based on local average gender distribution

²⁾ Gender as self-reported by the employees

SGL Carbon records its employees’ training hours both systematically on its learning platform (LMS), and manually or using other systems (e.g., recorded following a global data request). The latter are subject to uncertainties regarding completeness, with the result that the total number is partly calculated based on an estimate. A factor is derived using the manually recorded data and the local data infrastructure at sites (data completeness

and quality). This factor is then multiplied by the data collected in the global data request in order to estimate the total training hours not recorded by LMS. The total training hours (LMS plus estimate) are subsequently divided by the average headcount. Breakdown by gender is not currently possible due to the available data granularity. The absolute training hours per gender are therefore estimated based on the local gender ratio at SGL Carbon.

Health and safety metrics (S1-14)

The management systems and requirements for occupational health and safety at SGL Carbon apply to the entirety of our workforce. Information on our strategy, targets and actions relating to occupational health and safety can be found in the relevant sections in this chapter. In 2024, there were 94 accidents as defined by ESRS (88)(c) (Tier 3, 4 and 5 accidents), corresponding to an accident rate of 12.1 (accidents per million hours worked). This resulted in 736 calendar days of lost time for the internal and external workforce that year.

There are no findings on reportable work-related ill health at SGL Carbon or the competent supervisory authorities that is directly correlated to and caused by the working environment. There have been no deaths at SGL Carbon in the reporting year as a result of work-related accidents, injuries or ill health.

Work-life balance metrics (S1-15)

Family-Related Leave: Entitlement and Utilization (fiscal year 2024)

Entitled to family-related leave

Percentage of employees	100
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Percentage of entitled employees who took family-related leave

Female	Male	Other ¹⁾	Undisclosed	Overall
15.6	10.5	0	0	11.4

¹⁾ Gender as self-reported by the employees

Employees are entitled to family-related leave in all four categories – pregnancy and maternity leave, paternity leave, parental leave and carer’s leave – in all countries but China and Malaysia. In those countries, employees are entitled to three of the four categories, namely pregnancy and maternity leave, paternity leave and parental leave, but not carer’s leave.

Data was requested globally from SGL Carbon sites to collect the data for this data point, with the relevant country/site managers in HR providing the relevant information. All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, including working students, apprentices and interns who are employed for training purposes. The average headcount as of the quarter-end dates was used.

Compensation metrics (S1-16)

Gender Pay Gap worldwide¹⁾

	Dec 31, 24
Percentage	-2.54

¹⁾ Global estimation based on gender pay gap of United States and Germany

Employees at sites in Germany and the United States represent more than 60% of SGL Carbon’s workforce. Local payroll accounting in these two countries is closely linked to the SuccessFactors IT system. For these employees, we calculate the average gross hourly wage for the month of December in euros at the end of the year. To this end, we collect our data on the basic and guaranteed salary components for each employee and then calculate an hourly rate. Salaries not paid in euros are translated into euros. FX rates for the month of December are used for this as provided by Group Accounting. Gender is listed in the dataset for each employee. The average hourly rate for men and women is calculated and the formula set out in S1-16 (AR 98)(b) is applied. SGL Carbon focuses on these countries in order to provide the data at a reasonable cost.

All active employees at SGL Carbon are included as “employees” as defined by the disclosure requirements set out in ESRS S1, excluding working students, apprentices and interns who are employed for training purposes. The headcount as at year-end was used.

Social Matters

(Information in accordance with ESRS 1.114)

SGL Carbon is an internationally active company, as well as a local neighbor in several regions of Europe, Asia and North America. Our goal is to be a reliable partner and to go beyond our business activities by assuming social responsibility for the communities around our sites. We mainly support projects that have a local or subject-matter connection to the company, with a clear focus on promoting training and further education topics.

SGL Carbon's Sponsorship and Donations Policy provides the formal basis for our social engagement. It specifies the Group-wide standard and is binding for all SGL Carbon employees, ensuring that the funding and selection of projects is transparent and follows uniform guidelines. Management at each site makes decisions on the funding of specific projects, initiatives, institutions and associations up to a single amount of €5,000. For amounts in excess of this, the Board of Management must approve the sponsorship or donation, and the Investor Relations, Communications & Corporate Sustainability department must be informed. No violations of this policy were identified in the year under review.

"Affected communities" were considered as part of our double materiality analysis, i.e., possible impacts of our business activities at our sites on the people and environment nearby. Moreover, we examined potential risks and opportunities. This analysis also covered our upstream and downstream value chain. For further details on our double

materiality assessment process, please refer to the chapter "Strategy and material impacts, risks and opportunities" (ESRS 2 IRO-1). This implementation also considered the interests of our stakeholders. No material impacts, risks or opportunities were identified related to the social matters presented here.

We are involved in promoting education and training topics at schools in the regions in which we operate. An example of this is the Meitingen site, where we have school partnerships that give students an insight into the corporate world and seek to promote a better understanding of technical and skilled crafts professions. At our plant in Bonn, 35 students from nearby secondary schools took part in a Jump-in Day. At our Meitingen site, seven female students get an opportunity to find out about technical careers on Girls' Day. A book project for elementary school children at the Wiesbaden site aims to improve children's safety in road traffic. These are just some examples of our regional engagement.

We have been able to lend a special neighborly helping hand in Meitingen: With the local town hall due a deep energy retrofit, the staff there will move into SGL Carbon's old head administrative building at our site until the upgrading work is finished.

In addition to this selection of current projects, we particularly support sports and youth clubs, charitable initiatives and local projects around our sites that offer direct added value for the local community.

Business Conduct (G1) - Measures to Combat Corruption and Bribery

Strategies relating to business conduct and corporate culture (G1-1)

To be successful as a global company, SGL Carbon relies on trust, ethical conduct, and compliance throughout its entire organization and value chain. Employees, customers, suppliers, business partners, shareholders, the public, and we ourselves expect SGL Carbon to comply with applicable laws, uphold ethical principles, and act sustainably at all times and in all places.

Compliance with applicable laws, regulations, and policies helps minimize negative impacts and risks and supports positive impacts. These include risks related to corruption, competition law, economic sanctions, human rights, safety and health, data protection, and corporate reporting requirements.

Failure to comply with applicable regulations or to meet expectations of responsible corporate behavior could result in the loss or restriction of our local manufacturing licenses. In addition, violations of antitrust laws or export controls or cases of corruption or bribery, for example, may result in a loss of reputation or criminal and civil sanctions, such as fines and penalties, which could have a material adverse effect on SGL Carbon's earnings and financial position. Intransparent, irresponsible, and flawed business conduct can also limit access to financial resources through financial institutions and/or shareholders.

The double materiality analysis did not identify any significant financial risks and opportunities for SGL Carbon related to business conduct and corporate culture (governance).

However, SGL Carbon's products can have a significant negative impact on parts of society if export controls are not observed. This applies to our "dual-use" products or technologies that can be used for both civilian and military purposes. Export controls on dual-use items are designed to prevent their misuse for harmful purposes and to strike a balance between innovation and security. SGL Carbon's goal is to minimize negative impacts on society by managing potential negative impacts and risks while ensuring technological progress.

Our corporate policy and culture can also foster responsible business practices, contributing positively to society and the environment. We strive to positively impact the fight

against bribery, corruption, and human rights abuses through our actions, thereby helping to improve social security, well-being, and fair treatment in society.

SGL Carbon implemented a global whistleblower system as early as 2014, which employees, managers, and company outsiders can use to report possible violations of the law. Anonymous reports are also accepted. Indications of legal violations include possible violations of law, illegal conduct, or conduct that is inconsistent with our Code of Conduct or other internal policies, such as violations of our anti-corruption or antitrust policies. SGL's whistleblower system can also be used to report possible human rights violations or potential human rights or environmental risks, whether in SGL Carbon's own business or in our supply chain.

SGL Carbon is committed to protecting the data disclosed through the whistleblower system and the identity of the whistleblower. In accordance with the Code of Conduct and the provisions of the SGL Whistleblowing Policy, SGL Carbon will not tolerate any form of punishment, recrimination, or discrimination against SGL employees as a consequence of making a report in good faith. This applies in all cases, regardless of whether a reported incident ultimately proves to be a violation. This is also laid down in our SGL Whistleblowing Policy and the guidance on the whistleblower system.

Effective January 1, 2024, we revised the SGL Whistleblowing Policy to comply with the legal requirements of the German Act on the Protection of Whistleblowers (HinSchG), which implements the corresponding EU Directive (EU 2019/1937) into German law. At the same time, we published guidance on the whistleblower system, which, in addition to our Whistleblowing Policy, specifically governs the procedural requirements for the implementation of the whistleblower system and the complaints procedure, also taking into account the requirements of the German Supply Chain Act (LkSG).

The SGL Whistleblowing Policy and guidance are available in all nine local languages at SGL's sites. They are available to all SGL employees as controlled documents on SharePoint and on the Compliance page on the SGL intranet. In addition, the directive was distributed to all SGL employees for their personal digital information via the individual learning plan in the SGL People Portal. Third parties can access the guidance in the Compliance section of

SGL's website. Information on how to access the central hotline and its address can be found on the SGL website and on the SGL intranet, where it can be accessed with a single click.

To ensure that SGL production employees without individual PC workstations have easy access to the whistleblower system, we launched a global compliance poster campaign at our sites. The local language whistleblower posters include a QR code that links directly to the appropriate reporting address. To make all SGL employees, service providers, and visitors aware of the campaign, the sites were provided with whistleblowing posters in the local language with QR codes that link directly to the reporting address. The posters are displayed at central points on the sites (e.g. plant entrance, visitor/conference rooms, staff restaurant, bulletin boards or showcases).

The mandatory compliance training on the SGL Code of Conduct, which all SGL employees have to complete, regardless of whether they work in administration or production, also includes a separate training chapter on whistleblowing.

The Group Compliance department has, in addition to the Code of Conduct training, also defined a compliance training curriculum on SGL's internal learning portal, LMS, which brings together the other mandatory compliance training on anti-corruption, antitrust law, export control, and respect for human rights. The target groups and frequency of refresher courses are defined as rules and documented in the Compliance Manual. The SGL compliance training program is an integral part of SGL Carbon's ISO 37301 and ISO 37001 certified compliance management system and anti-corruption system (issue date 10/25/2023, validity date 10/25/2026). For more information on preventing and detecting corruption and bribery, see the information in section G1-3.

The responsible hotline operators confidentially collect, document, and consistently process all incoming reports of possible legal violations in accordance with data protection regulations. If there are indications of possible severe compliance violations, including, but not limited to, indications of possible corruption or bribery, the Group Compliance department must be involved and must conduct an independent investigation with the necessary expertise. Once the internal investigation has been completed, which may be conducted confidentially with the assistance of subject-matter experts, the appropriate and permissible punishment under labor law will be determined in conjunction with the local HR departments based on the severity of the violation. SGL Carbon reserves the right to take legal action against employees involved in violations and to assist authorities in

criminal investigations. On a regular basis, but at least once a year, Group Compliance reports on the information received and the results of internal investigations to the Board of Management as part of the semi-annual Compliance Report and to the Supervisory Board as part of the annual Compliance Report.

Management of relationships with suppliers (G1-2)

SGL Carbon's goal is to treat our suppliers in a responsible and equitable manner. We want our procurement policy to be based on fair and transparent business practices that incorporate social and environmental criteria into the selection and evaluation process. As part of our supplier relationships, our goal is to minimize supply chain risks while building a sustainable and resilient procurement structure. We also aim to promote positive effects on the well-being of society in our value chain by including environmental and social criteria in the selection of our suppliers.

We have implemented our **Business Partner Code of Conduct** (BPCoC) along with comprehensive procedures and systems to ensure that our suppliers share SGL Carbon's standards and values. These range from signing our BPCoC to signify its acceptance to a structured supplier management and audit process to a risk assessment system and clearly defined escalation processes. We also integrate training and guidelines that are designed to foster fair treatment of suppliers and compliance with legal and ethical standards. We consider and evaluate not only economic and quality aspects, but also social, environmental, and human rights issues.

The following is a detailed overview of the processes and actions that SGL Carbon implements to promote a supply chain that is characterized by sustainability and integrity.

SGL Carbon uses an internal SAP system to automatically process, approve, and pay incoming invoices. This process follows clearly defined internal instructions and does not depend on the amount of the invoice or the size or country of origin of the invoicing party. The following actions and quantitative data are intended to promote ethical and sustainable business practices in our dealings with suppliers.

The first step in our supplier management lifecycle is the supplier selection, which consists of the selection, nomination, and qualification of suppliers. This step considers social and environmental criteria alongside economic aspects.

SGL Carbon is committed to equal opportunity in the selection, nomination, and qualification of suppliers. We select our suppliers based on economic factors, quality, and supplier performance as well as compliance with legal provisions and standards such as the German Supply Chain Act (LkSG), the United Nations Universal Declaration of Human Rights, and anti-corruption laws. It is our clear policy not to discriminate on the basis of age, ethnicity and nationality, gender and gender identity, physical and mental ability, religion and belief, sexual orientation and identity, or social origin in our selection, nomination, and qualification processes. This is confirmed by the structured and mandatory selection, nomination, and qualification process (see the full description of the supplier management lifecycle).

One goal of the supplier selection process is to ensure that suppliers align themselves with SGL Carbon's sustainability standards and that they are familiar with and accept these standards by signing the BPCoC. This careful screening process includes an evaluation of suppliers with respect to their environmental impact, their compliance with labor and human rights, and their ability to support the standards required by SGL Carbon in their business activities. Suppliers are nominated and qualified using the IT-supported platforms "Onventis" and "Integrity Next." While Onventis is used for the collection of master data, all suppliers that generate an annual turnover of more than €2,500 with SGL Carbon and are classified in a critical material group are subject to an ESG risk assessment via Integrity Next³.

In the second step of the supplier management lifecycle, our suppliers undergo an annual evaluation process that includes a financial and a non-financial risk assessment. This includes a risk analysis using Integrity Next, a digital sustainability platform based on various sustainability matters:

- a) Abstract risks (industry and country risks)
- b) Specific risks (suppliers' self-assessment in occupational health and safety, environmental protection, business continuity, conflict minerals, cybersecurity, responsibility in the supply chain, people and labor rights, anti-corruption and anti-bribery, and a requirement to provide certifications (e.g. quality management ISO 9001) and
- c) ESG risks identified on Integrity Next

The non-financial risk assessment is based on SGL Carbon's proprietary heat map, which was specifically developed to systematically evaluate suppliers based on the risks listed in a), b), and c). The different colors on the heat map indicate the risk potential based on the criteria. The results of this risk assessment are used to develop specific actions, from contacting and consulting with suppliers, defining actions to minimize risk, and taking further steps all the way up to on-site audits. If the agreed-upon corrective actions are not implemented rigorously enough and deficiencies persist, the supplier performance escalation process implemented by SGL Carbon will be initiated. It includes recommended consequences, criteria for ending escalation, and information on involving relevant stakeholders. This may result in termination of the business relationship.

The third step in the supplier management lifecycle involves conducting on-site visits and audits. These are used both to meet our quality standards (modeled on ISO 9001, for example) and to check our suppliers' ESG performance to encourage improvement where necessary. Also, in 2024, 4,133 of a total of 21,736 suppliers were included in the supplier risk identification process. Of these, 99% of our relevant suppliers are registered on the Integrity Next sustainability platform. 61% of the relevant suppliers have been fully risk-assessed. 39% were assessed only in the abstract risk assessment domain (country and industry risk). Examples of these risks include anti-corruption, environmental risks, country and industry risks, human rights and work conditions, ESG risks, supply chain responsibility, and conflict mineral risks. The key figures in this section (G1-2) have not been validated by an external body.

An important part of our support and dialog with suppliers is the training of our staff in Purchasing. In 2024, all supplier-facing SGL Purchasing employees were required to attend a comprehensive two-day negotiation training course. Professional dialog with suppliers requires completion of online training on anti-corruption, export control, the German Supply Chain Act (LkSG), and INCOTERMS (international commercial terms) (see also section G1-3 of this chapter).

³ The audit conducted by KPMG AG Wirtschaftsprüfungsgesellschaft, Frankfurt am Main, did not include the valuations determined by Integrity Next.

In addition, our employees, as well as company outsiders such as suppliers or other business partners of SGL Carbon who wish to report a violation of compliance, human rights, or other legal provisions along our value chain, can submit their report using our official whistleblower system (see also section G1-1 of this chapter).

G1-3 and G1-4 Preventing, detecting, and responding to incidents of corruption and bribery

We believe that good relationships with customers and suppliers are essential to SGL Carbon's positive economic development. SGL Carbon requires and encourages its employees and business partners to conduct all company business lawfully and transparently. SGL Carbon expects that this approach will create a sense of trust and secure lasting business relationships.

SGL Carbon's principles for combating bribery and corruption are laid down in SGL's **Anti-Corruption Program**, which has long been in force throughout the Group. SGL Carbon's anti-corruption management system was successfully certified to ISO 37001:2016 by an external organization for the first time in the 2023 fiscal year. It successfully completed the first surveillance audit under ISO 37001:2016 during the past fiscal year.

By signing the UN Global Compact, SGL Carbon has made a commitment to Principle 10 of the UNGC to combat corruption in all its forms, including extortion and bribery. This commitment is also enshrined in our Code of Conduct and Anti-Corruption Policy. We have outlined these expectations for our business partners and suppliers in our Business Partner Code of Conduct.

In addition, SGL Carbon has strict rules in place with regard to donations to political parties. Under these rules, it is prohibited to contribute to political parties, candidates for political office, or elected officials. The rules are set forth in our Code of Conduct and our Sponsorship and Donations Policy. They apply to all employees of SGL Carbon, including members of the Board of Management.

After the revision of the SGL Anti-Corruption Policy in 2023 and its worldwide distribution through our PEOPLE Portal to the entire target group, which we defined as "all administrative employees (office workers in the SGL PEOPLE Portal)," the policy is now constantly being distributed to new hires through the SGL PEOPLE Portal. This digitalized process

requires employees to acknowledge receipt of the policy and confirm that they have read it. A total of 99% of the target group confirmed having read the policy by the end of 2024. The target group also includes members of the Board of Management and managing directors of SGL subsidiaries.

The Anti-Corruption Policy is available in nine languages and can be accessed by all SGL employees at any time as a controlled document on Sharepoint. For more information on anti-corruption, please visit the Compliance pages on the SGL intranet.

The anti-corruption training included in the compliance training catalog was revised in the 2024 fiscal year and is currently available as mandatory training in German and English on our SGL PEOPLE Portal. The target group includes not only all office workers but also the members of the Board of Management and the managing directors of SGL subsidiaries. We have deliberately defined the target group to be very broad because we believe that all employees in administrative and managerial positions need to be sensitized to potential corruption risks.

This training explains what corruption is, what forms it can take, and what criminal acts are defined in applicable laws and regulations, including the Foreign Corrupt Practices Act (FCPA) and the UK Bribery Act. In addition to these basics, the training will cover SGL's Anti-Corruption Policy as well as permissible and impermissible approaches to invitations, gifts, and business meals. All new employees in the target group were assigned the training in 2024. Of these, 95% have completed the training.

The anti-corruption training program and curriculum are also available on the SGL PEOPLE Portal. As a rule, existing employees in the target group must complete a refresher course every two years. Training was provided to 651 employees in 2024 as part of the curriculum. 98% have already completed the training. The key figures in this section (G1-3 and 4) have not been validated by an external body.

SGL Carbon has a Group-wide "Business Partner Compliance" (BPC) process to monitor risks and manage all processes that relate to dealing with sales agents. The target groups for the BPC process are currently sales agents and distributors. The process requires that new business partners in the target group undergo a multi-stage review before any contracts are signed. This process is also part of an internal control mechanism within the framework of the internal control system (ICS). The nominated business sponsors from the

business units are responsible for starting this process. Following the 2023 revision of the contract documents for sales agents and distributors and the addition of the updated Business Partner Code of Conduct, all active sales agents in the China region received personal training and instruction on SGL's compliance principles in the past fiscal year, particularly with regard to potential corruption risks when initiating business. The sales agents for the North American sales region were trained in December 2024. Sales agents in the EMEA region already received training in 2023. The training series for this region is scheduled to continue in 2025.

No reports of possible corruption or bribery involving SGL Carbon or its employees were received through the whistleblower system or otherwise in the past fiscal year. There were no convictions due to corruption or bribery offenses.

Any indications of possible corruption or bribery are potentially severe compliance violations that must be reported to Group Compliance in accordance with the SGL Whistleblowing Policy. Regional hotlines receiving such reports are required to escalate them to Group Compliance. SGL Carbon wants to ensure that these matters can be investigated and processed with the necessary expertise and organizational independence from any SGL company or department that may be affected.

Group Compliance reports to the Board of Management on any whistleblowing reports it may have received, as well as the results and findings of internal investigations as part of its semi-annual Compliance Report, and to the Audit Committee of the Supervisory Board as part of the annual Compliance Report. For more information on whistleblowing and SGL's whistleblower system, please refer to section G1-1.

SGL Carbon did not make any donations to political parties, candidates for political office, or elected officials in the past fiscal year.

Supplementary report to the non-financial Group statement (acc. ESRS1 para. 7.3)

Restructuring of the Carbon Fibers (CF) business unit

On February 18, 2025, SGL Carbon announced the restructuring of the loss-making Carbon Fibers (CF) business unit. SGL Carbon will significantly reduce CF business operations and focus on a profitable core. Individual solutions are being developed for all CF sites, including the closure of unprofitable sites.

The announced restructuring of the Carbon Fibers business unit may also have potential impacts on SGL Carbon's Sustainability Statement in the future.

Regarding the material impacts, risks and opportunities identified in the double materiality analysis for SGL Carbon's business model and the upstream and downstream value chains, no changes are expected due to the restructuring of the CF business unit. The identified material impacts, risks and opportunities relate to the entire SGL Carbon Group and not to individual business units.

At the time of preparing this Sustainability Statement, no concrete statements can yet be made about the scope of the restructuring. Consequently, we can currently only estimate possible general impacts on future parameters.

Due to the planned restructuring of the CF business unit, we anticipate a general reduction in consumption data (e.g., waste, energy consumption, etc.) for SGL Carbon. This particularly includes energy consumption and, as such, the absolute level of greenhouse gas (GHG) emissions of SGL Carbon. With a possible reduction in revenue due to focusing CF on a profitable core, the CO₂ emissions compared to economic performance (intensity) could also decrease in the future.

Regardless of the extent of the CF restructuring, the emission of GHG emissions will remain a significant environmental impact of our business activities due to the energy intensity of the Graphite Solutions business unit. Against this background, we will review our transition plan in 2025.

The restructuring of CF may lead to a reduction in the number of our employees in the future. However, we do not expect a significant change in the characteristics and parameters of our own workforce.

Wiesbaden, March 18, 2025

SGL Carbon SE
The Board of Management of SGL Carbon SE

Andreas Klein

Dr. Stephan Bühler

Thomas Dippold

The English language text below is a translation provided for information purposes only. The original German text shall prevail in the event of any discrepancies between the English translation and the German original. We do not accept any liability for the use of, or reliance on, the English translation or for any errors or misunderstandings that may arise from the translation.

Assurance report of the independent German Public Auditor on a limited assurance engagement in relation to the consolidated non- financial reporting included in the Annual Report

To the SGL Carbon SE, Wiesbaden

Assurance Conclusion

We have conducted a limited assurance engagement on the separate non-financial group report of SGL Carbon SE, Wiesbaden, for the financial year from January 1 to December 31, 2024, prepared to fulfil the requirements of Sections 315b and 315c of the HGB [Handelsgesetzbuch: German Commercial Code] including the information contained in this consolidated non-financial statement to fulfill the requirements of Article 8 of Regulation (EU) 2020/852 (hereinafter the "consolidated non-financial reporting").

Not subject to our assurance engagement were the external sources of documentation or expert opinions mentioned in table "Additional information" of the consolidated non-financial reporting which are marked as unassured.

Based on the procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the accompanying consolidated non-financial reporting for the financial year from January 1 to December 31, 2024 is not prepared, in all material respects, in accordance with Sections 315b and 315c HGB, the requirements of Article 8 of Regulation (EU) 2020/852 and the supplementary criteria presented by the executive directors of the Company.

We do not express an assurance conclusion on the external sources of documentation or expert opinions mentioned in table "Additional information" of the consolidated non-financial reporting which are marked as unassured

Basis for the Assurance Conclusion

We conducted our assurance engagement in accordance with International Standard on Assurance Engagements (ISAE) 3000 (Revised): Assurance Engagements Other Than Audits or Reviews of Historical Financial Information issued by the International Auditing and Assurance Standards Board (IAASB).

The procedures 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 is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under ISAE 3000 (Revised) are further described in the section "German Public Auditor's Responsibilities for the Assurance Engagement on the consolidated non-financial reporting".

We are independent of the entity in accordance with the requirements of European law and German commercial and professional law, and we have fulfilled our other German professional responsibilities in accordance with these requirements. Our audit firm has applied the requirements for a system of quality control as set forth in the IDW Quality Management Standard issued by the Institut der Wirtschaftsprüfer [Institute of Public Auditors in Germany] (IDW): Requirements for Quality Management in the Audit Firm (IDW QMS 1 (09.2022)) and International Standard on Quality Management (ISQM) 1 issued by the IAASB. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our assurance conclusion.

Emphasis of Matter – Principles for the preparation of the consolidated non-financial reporting

Without modifying our audit opinion, we refer to the disclosures in the consolidated non-financial reporting, which describe the principles for the preparation of the consolidated non-financial reporting. Accordingly, the Company has applied the European Sustainability Reporting Standards (ESRS) to the extent specified in Section “Basis of Preparation (BP-1 and BP-2)” of the consolidated non-financial reporting.

Responsibilities of the Executive Directors and the Supervisory Board for the consolidated non-financial reporting

The executive directors are responsible for the preparation of the consolidated non-financial reporting in accordance with the applicable German legal and other European requirements as well as with the supplementary criteria presented by the executive directors of the Company and for designing, implementing and maintaining such internal control that they have considered necessary to enable the preparation of a consolidated non-financial reporting in accordance with these requirements that is free from material misstatement, whether due to fraud (i.e., fraudulent sustainability reporting in the consolidated non-financial reporting) or error.

This responsibility of the executive directors includes establishing and maintaining the materiality assessment process, selecting and applying appropriate reporting policies for preparing the consolidated non-financial reporting, as well as making assumptions and estimates and ascertaining forward-looking information for individual sustainability-related disclosures.

The Supervisory Board is responsible for overseeing the process for the preparation of the consolidated non-financial reporting.

Inherent Limitations in Preparing the consolidated non-financial reporting

The applicable German legal and other European requirements contain wording and terms that are subject to considerable interpretation uncertainties and for which no authoritative, comprehensive interpretations have yet been published. Therefore, the executive directors

have disclosed their interpretations of such wording and terms a. o. in section "Information in Relation to Article 8 of the EU Taxonomy" of the consolidated non-financial reporting. The executive directors are responsible for the reasonableness of these interpretations. As such wording and terms may be interpreted differently by regulators or courts, the legality of measurements or evaluations of sustainability matters based on these interpretations is uncertain. As further set forth in section “Basis of Preparation (BP-1 and BP-2)” of the consolidated non-financial reporting, the quantification of the non-financial performance indicators on Scope 3 category 12, resource outflows, training hours and the gender pay gap are also subject to inherent uncertainties due to a high degree of determination and/or measurement uncertainty.

These inherent limitations also affect the assurance engagement on the consolidated non-financial reporting.

German Public Auditor’s Responsibilities for the Assurance Engagement on the consolidated non-financial reporting

Our objective is to express a limited assurance conclusion, based on the assurance engagement we have conducted, on whether any matters have come to our attention that cause us to believe that the consolidated non-financial reporting has not been prepared, in all material respects, in accordance with the applicable German legal and other European requirements and the supplementary criteria presented by the company’s executive directors, and to issue an assurance report that includes our assurance conclusion on the consolidated non-financial reporting.

As part of a limited assurance engagement in accordance with ISAE 3000 (Revised), we exercise professional judgment and maintain professional skepticism. We also:

- obtain an understanding of the process used to prepare the consolidated non-financial reporting, including the materiality assessment process carried out by the entity to identify the disclosures to be reported in the consolidated non-financial reporting.
- identify disclosures where a material misstatement due to fraud or error is likely to arise, design and perform procedures to address these disclosures and obtain limited

assurance to support the assurance conclusion. The risk of not detecting a material misstatement resulting from fraud is higher than the risk of not detecting a material misstatement resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. In addition, the risk of not detecting a material misstatement in information obtained from sources not within the entity's control (value chain information) is ordinarily higher than the risk of not detecting a material misstatement in information obtained from sources within the entity's control, as both the entity's executive directors and we as practitioners are ordinarily subject to restrictions on direct access to the sources of the value chain information.

- consider the forward-looking information, including the appropriateness of the underlying assumptions. There is a substantial unavoidable risk that future events will differ materially from the forward-looking information.

Restriction of Use/Clause on General Engagement Terms

This assurance report is solely addressed to SGL Carbon SE, Wiesbaden.

The engagement, in the performance of which we have provided the services described above on behalf of SGL Carbon SE, Wiesbaden, was carried out on the basis of the General Engagement Terms for Wirtschaftsprüferinnen, Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften (Allgemeine Auftragsbedingungen für Wirtschaftsprüferinnen, Wirtschaftsprüfer und Wirtschaftsprüfungsgesellschaften) dated as of January 1, 2024 (www.kpmg.de/AAB_2024). By taking note of and using the information as contained in our report each recipient confirms to have taken note of the terms and conditions stipulated in the aforementioned General Engagement Terms (including the liability limitations to EUR 4 million specified in item No. 9 included therein) and acknowledges their validity in relation to us.

Frankfurt am Main, March 18, 2025

KPMG AG
Wirtschaftsprüfungsgesellschaft
[Original German version signed by:]

Dr. Gnändiger
Wirtschaftsprüfer
[German Public Auditor]

Strzalkowski
Wirtschaftsprüfer
[German Public Auditor]

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