



METAL TRADE COMAX, a.s.

# Sustainability Report 2024

COMAX DEVELOPMENT

Mimořádně  
úsporná

A



## Contents

Foreword .....	3
METAL TRADE COMAX, a.s. ....	4
Principles for compiling a sustainability report .....	6
EU Taxonomy .....	7
Assessing the significance of sustainability topics .....	8
Environment .....	14
E1 Climate change .....	15
E2 Pollution .....	23
E3 Water and marine resources .....	23
E4 Biodiversity and diversity.....	24
E5 Resource use and circular economy .....	25
Social .....	30
S1 Employees and working environment.....	31
S2 Workers in the value chain .....	39
S3 Affected communities .....	39
S4 Customers and end users .....	40
Governance .....	41
Appendix No. 1 .....	50
Decarbonization plan of METAL TRADE COMAX, a.s.....	50





# Foreword

Dear readers,

I am pleased to welcome you to the opening words of this ESG report. As the director of our company METAL TRADE COMAX, a.s., it is my honor and pleasure to present to you our efforts and commitment in the area of environmental, social and corporate governance responsibility.

Nowadays, there is an increasing emphasis on how businesses contribute to a sustainable future. I am proud that our company recognizes the importance of ESG factors and actively addresses them. Our commitments are not just words but are part of our daily business.

This comprehensive report provides an overview of our achievements, goals and the measures we are taking to achieve high standards in the areas of environment, work environment and society. It aims not only to inform, but also to inspire and create space for further innovation and improvement.

Although the carbon footprint for METAL TRADE COMAX, a.s. represents a relatively small share (3 %) of the total emission load of the product compared to the carbon footprint of input materials, we are actively involved in this area. In cooperation with our suppliers, we map the energy intensity of input materials and try to contribute to reducing the carbon footprint with our purchasing strategy in accordance with customer requirements. We focus on reducing dependence on external energy sources with unsatisfactory environmental parameters by building solar power plants on the roofs of our production and administrative buildings and we work on using waste heat from production.

In compiling this report, we looked for ways to better adapt not only to today's challenges but also to the future. We are committed to reducing our environmental footprint, increasing the diversity and inclusion of our teams, and building strong relationships with our customers, becoming not just their supplier, but also their partner in achieving their own goals.

This ESG report is our company's commitment to continuous improvement. We understand that the journey to sustainability and responsibility is long, but we are committed to doing everything we can to become a leading example in the field of ESG.

Thank you for your support and interest in this ESG report. I believe that together we can achieve meaningful and significant change and create a world in which we can live and thrive with the feeling of having contributed to a sustainable future.

Respectfully,

Mgr. Matej Kosturák , LL.M.

Company Director



# METAL TRADE COMAX, a.s.

**METAL TRADE COMAX, a.s. (hereinafter referred to as MTC)** is a Czech industrial company with a tradition dating back to 1938, when it was founded in Velvary, Central Bohemia, under the name Hutě Dr. Wertheima. Today, MTC is a major player in the field of metal materials processing - especially in the treatment and painting of metal strips (coil-coating), their cutting into strips and sheets, the production of roofing materials and corresponding components, and the production of profiles.

During its development, the company expanded from its original headquarters in Velvary to other locations through subsidiaries operating in the Czech Republic, Slovakia, the United Kingdom and Germany. In 2023, the metallurgical operation was spun off into the newly established company **OETINGER CZ s.r.o.** However, MTC continues to maintain its headquarters in Velvary, where it remains a significant regional employer and active partner of the local community.

MTC is aware of its responsibility towards people and the environment. Given the energy intensity of the technologies it operates, it emphasizes the efficient use of energy and human resources. A fundamental role in this regard is played by the constant modernization of production processes, optimization of the working environment and the introduction of innovative technologies that contribute to sustainability and employee satisfaction.

One of the company's strategic goals is to become an environmentally and energy-responsible industrial company. This goal is achieved through an integrated management policy, the implementation of an energy management system according to ISO 50001, and the setting of specific environmental and energy goals. The company's management expresses a commitment to reducing energy consumption and promotes an active approach to environmental protection as a core corporate value. These principles are communicated not only internally to employees, but also externally, to the wider public.

MTC strictly complies with applicable laws and regulations, including the Integrated Prevention Act No. 76/2002 Coll. and European Union regulations, in particular Directive 2010/75/EU on Industrial Emissions (IED). Since 2005, the company has been certified according to the ISO 14001 standard (Environmental Management System – EMS), on the basis of which it regularly identifies environmental risks and takes measures to prevent and eliminate them.

Within the framework of the integrated management system, the company also applies the principles of other standards:

- **ISO 9001** – quality management system,
- **ISO 45001** – occupational health and safety system,
- **ISO 50001** – energy management system

Emphasis on ethics, transparency, effective management and long-term sustainability are the fundamental building blocks of the business approach of METAL TRADE COMAX, a.s.



Production is of fundamental importance to our company, which we strive to carry out, while minimizing our impact not only on the environment, but also on human resources. Regular maintenance of production equipment enables production without accidents that could affect our employees, customers and, last but not least, the environment. Equipment maintenance is carried out at regular intervals according to a set repair plan, and modernization is also carried out where possible. Thanks to these steps, we have recently achieved a reduction in the amount of production waste and non-conforming products, as well as a reduction in work-related accidents. Thanks to good communication with suppliers, we are able to provide our customers with a product according to their requirements in a reasonably long time. In cooperation with customers or the market, we create new products with which we expand our range, whether it is new types of coatings or products such as special profiles, material for external/internal blinds, etc.

We try to respond quickly and flexibly to requirements and thanks to modern technological equipment we are successful in this. We are expanding our market to other countries in an effort to reduce our carbon footprint and overall emission burden. Some production facilities are on the verge of further improvement, despite their modernization, and therefore it was necessary to think about further optimization of these processes. In the coming years, a new coil-coating line will be built, which will meet new strict criteria, and even exceed them, both for emissions released into the air/water and for water consumption in the production process.

Improvement is essential for us not only due to new possibilities for our customers, but also to avoid tightening legislative limits.

We deal with a more difficult situation with purchasing raw materials, when our suppliers are also our competitors. Therefore, compared to large production facilities, especially coil-coating line, we offer our customers more tailored services, whether it is the quantity purchased or the product range.

An important issue in production is not only the machines, but also our employees, whom we take care of as best as possible and try to meet their needs. We try to recruit new qualified employees, but unfortunately, due to low level of unemployment, this situation is more difficult, especially in some locations, but we must try even harder to offer promising jobs with prospects for the future.



## Principles for compiling a sustainability report

This report has been prepared for the entire company as a consolidated entity METAL TRADE COMAX, a.s. However, for some subsidiaries, not all relevant data was available to the required extent for 2024. In the coming years, we will focus on systematically expanding and streamlining data collection in accordance with the requirements of the CSRD directive in order to ensure a higher level of completeness and transparency of reported information.

To ensure high-quality ESG reporting, a working group consisting of heads of key departments and representatives of senior management was established. The aim of this composition was to ensure the widest possible range of professional perspectives and a deeper understanding of the issue across the entire organization. ESG topics should be integrated across all levels of the company, and it is precisely this interdisciplinary connection that enables the effective implementation of these principles.

Thanks to the involvement of experts, we were able to identify possible improvements and propose strategic measures for individual areas. Some members of the working group also actively work with suggestions from surrounding communities and reflect legislative requirements, allowing us to consider a wider range of stakeholders - even those not directly represented in the negotiations.

Given our company's significant contribution to the overall carbon footprint, we are fully aware of our responsibility to reduce greenhouse gas emissions. Since 2019, we have been systematically monitoring our carbon footprint in Scope 1 and Scope 2, i.e. direct and indirect emissions associated with our own operations and energy consumption.

Since 2021, we have further expanded our approach to include the calculation of our Scope 3 carbon footprint, which also includes indirect emissions within the value chain, such as transportation, raw material purchases, and product disposal. This data gives us an overview of emissions trends in all three categories and allows us to better plan measures to reduce our environmental burden.

Tracking our carbon footprint in full is an important part of our strategy for sustainable development and climate risk management.



## EU Taxonomy

When evaluating our activities under the EU Taxonomy rules, we identified construction and real estate as key areas. These activities are eligible under the EU Taxonomy; however, the level of compliance has not yet been assessed.

Nevertheless, it is in these areas that we see a certain potential for our company in the future. We manage buildings with an emphasis on energy efficiency and sustainability. In new projects, we prioritize the use of existing brownfields, thereby protecting the surrounding landscape. Our priority is to use modern technologies, be following current legislation and continuously reduce our ecological footprint.

An example of our efforts is a newly completed apartment building, which has a class A energy label and its own photovoltaic power plant on the roof.



# Assessing the significance of sustainability topics

We have already processed the first materiality assessment in accordance with the requirements of the European Sustainability Reporting Standards (ESRS), as set out in Commission Delegated Regulation (EU) 2023/2772, supplementing Directive 2013/34/EU, for 2023, and these topics were subsequently re-checked for 2024 to verify the timeliness of the data obtained.

The objective of this assessment was to identify significant topics that have a material impact on our company, its operations and its value chain, in accordance with ESRS Article 1, Annex A (AR16). The assessment focused on identifying sustainability impacts, risks and opportunities that apply both to our internal operations and to the broader context of our operations within the value chain.

A sustainability topic is considered significant in terms of impact if it relates to the actual or potential, positive or negative impacts of a company on the environment or on people, in the short, medium or long term.

Through this process, we have laid the foundation for transparent and structured reporting that reflects our company's true sustainability priorities while also meeting EU regulatory requirements.

## Dual significance assessment process

We performed the dual significance assessment in three consecutive phases, with the entire process being in accordance with the requirements of the ESRS 1 standard, Appendix A (AR16):

### Phase 1: Identifying relevant topics

In the first phase, we prepared input documents, in particular the identification of relevant areas and sub-topics of sustainability as defined in the ESRS standard. This step created the basic framework for further assessment.

### Phase 2: Assessment of impact and financial significance

In the second phase, a dual materiality assessment was carried out – from the perspective of impacts on the company and its surroundings, as well as from the perspective of financial risks and opportunities. The assessment was carried out in cooperation with an internal ESG working group, consisting of department heads and representatives of senior management.

The Group also considered feedback from key stakeholders, in particular:

- **local communities**, which are indirectly represented through working group members actively addressing their initiatives,
- **state administration bodies**, whose legislative requirements form a significant part of the external evaluation framework.





### Phase 3: Identifying significant topics

In the third phase, based on the previous assessment, a narrower group of significant topics was selected, which were further analyzed from the perspective of their relevance both for society and for sustainability in general.

These topics were subsequently discussed within the ESG working group, whose interdisciplinary approach enabled a comprehensive approach to assessment and proposals for specific strategies for long-term improvement and responsible impact management.

The resulting significant sustainability topics are listed in separate appendix.

*Table Summary of material topics.*

Topic	Impacts $\Sigma$		Risks $\Sigma$	Opportunities $\Sigma$
	Negative	Positive		
E1 – Climate change	X		X	X
E2 – Pollution	X		X	X
E3 – Water and marine resources	X		X	X
E4 – Biodiversity				
E5 – Circular economy	X	X	X	X
S1 – Own employees	X	X	X	X
S2 – Employees in the supply chain				
S3 – Affected communities	X	X	X	X
S4 – Consumers and end users	X		X	X
G1 – Corporate Behavior		X		X

To assess the materiality of the selected topics, we assessed them in terms of impacts, risks and opportunities. The assessment was carried out on a scale of 1 to 3, with a detailed breakdown provided in the Impact Analysis Assessment Table and the Risk and Opportunities Assessment Table.

When assessing risks and opportunities, we considered time horizons: we assess the short-term horizon up to 1 year, the medium-term horizon up to 2030, and the long-term horizon up to 2050. We compared individual aspects with developments in 2021–2024.

*Table Impact Analysis Evaluation*

Intensity	Scope (market share)	Repairability
1 Negligible – no one sees it negatively	1 0-1%	0 Repairable
2 Sensitive, but within legal limits	2 1-10%	1 Irreparable
3 Exceeding the limits common in the EU	3 10-100%	

For the impact analysis, a topic was assessed as material if the sum of the scores was 4 or more.



Table Risk and Opportunity Assessment

Probability	Financial impact
1 The situation is unlikely to occur	1 0-1%
2 The situation is more likely to occur	2 1-10%
3 The situation is almost certain to occur	3 10-100%

In the risk and opportunity analysis, a topic was assessed as material if the product of the scores was 4 or more.

When addressing material issues, we also came to conclusions that were important to us in terms of the company's prosperity. We clarified the points that need to be developed and the situations that need to be minimized in order to avoid disruption of production and business continuity. When identifying topics relevant to our company, we conducted a materiality assessment after consulting with the working group. Based on this analysis, we concluded that all topics defined by the CSRD are material for us, with the exception of the areas of biodiversity and ecosystems (E4) and workers in the value chain (S2). During this dialogue, the first strategic directions for individual topics were also formulated, which can be further developed within the framework of process improvement and innovation activities. The materiality assessment will be carried out annually in order to capture all relevant topics and areas in which we have influence in a timely manner.

Topic **Climate change (ESRS E1)** was identified as a material area for our company based on the materiality assessment. We are a manufacturing company and therefore generate a significant carbon footprint, which has a significant impact on the surrounding environment.

The impact analysis confirmed that we have negative impacts in this area that pose risks, but at the same time we also see opportunities for improvement and innovation leading to a reduction in our carbon footprint.

Area **(ESRS E2)** was determined as material for our company based on the materiality assessment. Due to emissions of pollutants into the air and water, we continuously monitor this area and ensure compliance with all legal conditions and emission limits. The measured values are regularly monitored and reported to the relevant state administration authorities.

In this area, we perceive risks, especially in tightening legislative requirements, but on the other hand, we see opportunities in the introduction of modern technologies that can further minimize the release of pollutants into the environment.

The area of **water and marine resources (ESRS E3)** was determined as material for our company based on the materiality assessment. We have a negative impact on this topic within our operations as we use water resources to a high extent and their pollution can occur.

At the same time, we perceive risks in this area, for example in the form of tightening legislative requirements for water management and the quality of discharged water. On the other hand, we also see opportunities - primarily in the implementation of new

technologies that enable more efficient water use, recycling and reduction of the amount of water consumed in our production processes.

Based on the location of our production facilities, we have concluded that our activities do not have a negative impact on **biodiversity and ecosystems (ESRS E4)**. When expanding our capacities, we emphasize the use of existing areas and minimize interventions in the surrounding landscape. In line with our strategy of reducing dependence on purchased electricity, we have proceeded to install photovoltaic power plants on the roofs of existing buildings, thereby effectively using the available area without further burdening the landscape.

In 2025, we plan to start construction of a new coil-coating line, which will contribute to the modernization and streamlining of the metal strip coating process. However, this project requires the expansion of the site to include an adjacent field, which will provide the necessary space for the new production hall. The land preparation is being carried out in accordance with the applicable legislation on soil protection and management.

The area **of resource use and circular economy (ESRS E5)** was determined as material for our company based on the materiality assessment. In this area, we record positive impacts, which consist mainly of the recyclability of our products, the reuse of materials, recycling of packaging and the optimization of waste management. These activities contribute to reducing the environmental burden and support the principles of the circular economy. At the same time, we are also aware of negative impacts, primarily in the form of the generation of a significant amount of waste as a result of production processes and the high consumption of materials and raw materials, which can burden the environment. Although we do not assess the generated hazardous waste as a major negative impact, given that we manage it in accordance with legal requirements, we nevertheless perceive its existence and strive for its continuous reduction and effective management.

We have also identified risks in this area, particularly related to increasing legislative and market demands for higher recycling rates and responsible resource management. At the same time, we see opportunities, for example in the introduction of modern technologies and processes that contribute to reducing waste, increasing the share of recycled materials, and the overall development of circular economy principles.

**Our own employees (ESRS S1)** were identified as a high priority topic based on the materiality assessment. We therefore pay close attention to identifying and closely monitoring the negative impacts that our activities may have on employees, while actively seeking to implement positive measures that mitigate or, ideally, eliminate these impacts.

In our materiality analysis, we also identified a number of opportunities to improve working conditions, enhance employee satisfaction and create a safer and healthier work environment. We see these activities as an important part of our responsibility and long-term sustainable strategy.

The topic **of workers in the value chain (ESRS S2)** was not assessed as material based on the analysis performed. Our key suppliers are established companies that already



report independently according to ESG standards and apply responsible approaches in the area of human resources management.

All our suppliers and customers are required to comply with the company's Code of Ethics, the content of which they are familiar with. Adherence to these principles is part of the terms of cooperation and contributes to ensuring responsible behavior across the entire value chain.

**Affected communities (ESRS S3)** were identified as a material topic with significant impact in the materiality assessment. We have identified negative impacts from our operations, which may include, for example, noise, dust or increased traffic congestion around our production facilities. We actively monitor these impacts and take measures to mitigate their impact on the quality of life of residents in our area.

At the same time, we see opportunities in this area, for example through open communication with local communities, support for regional projects, and involvement in activities that contribute to the development and improvement of the quality of life in our region.

We see risks in particular in tightening legislative requirements that may affect our operating conditions, and in growing public expectations towards responsible business. That is why the area of relations with local communities is part of our long-term sustainability strategy.

The topic **of consumers and end customers (ESRS S4)** was previously assessed as immaterial, considering the fact that our company primarily produces materials intended for further processing. However, due to the growing share of direct sales of roofing materials produced in our Comax Roofs operation, this area is becoming increasingly important for us. With this development, our direct contact with end customers is also growing, and therefore we consider it necessary to include this topic in our material framework. The quality of our products is a priority for us, and we resolve any discrepancies professionally, quickly and with maximum emphasis on customer satisfaction.

**The area of management and administration (ESRS G)** was identified as material for our company based on the materiality assessment, considering the significant impact it can have on our business and reputation. In the area of governance, we record positive impacts, for example, in the form of established internal control mechanisms, transparent decision-making process and adherence to ethical principles and standards.

At the same time, we are aware of the potential negative impacts that may arise, for example, from inadequate risk management processes, inconsistent supervision or violations of ethical principles. The materiality analysis identified risks arising mainly from tightening legislative requirements, increasing pressure on transparency and accountability of companies, and growing expectations of stakeholders.

We see opportunities in particular in the possibility of further developing a corporate culture based on open communication, ethical behavior and a responsible approach to business. We also see space for the implementation of new tools and processes that will



strengthen management efficiency, increase transparency and support the long-term sustainability of our company.





A glass globe with a green and blue pattern, partially covered in green grass, with the word ENVIRONMENTAL overlaid.

**ENVIRONMENTAL**



The area of environmental topics forms a key pillar of our ESG approach, as our activities as industrial manufacturers bring with them significant environmental aspects and responsibilities. As part of the materiality analysis, it was assessed that our company has the most significant impact in the area **E1 – Climate Change** , which includes energy consumption, greenhouse gas emissions and strategies for mitigation and adaptation to climate change.

Our goal is to reduce our carbon footprint through cost-saving measures, increasing energy efficiency and using renewable energy sources. In this context, we are implementing specific steps, such as building photovoltaic power plants on the roofs of production halls and investing in the modernization of production technologies. Waste and packaging are also a key issue for us, where we are trying to optimize the amount and management of them. For us, environmental issues are not only a matter of compliance with legislative requirements, but also an opportunity for innovation and the long-term sustainability of our business.

### E1 Climate change

Because we are aware of the significant contribution of our company to the overall carbon footprint, we have decided to monitor the company's carbon footprint in Scope 1 and 2 since 2019. And since 2021, we have expanded the calculation of the company's carbon footprint to Scope 3 and are monitoring the development trend in all three areas.

In Scope 3, the carbon footprint increased due to broader data collection and more accurate carbon footprint reporting.

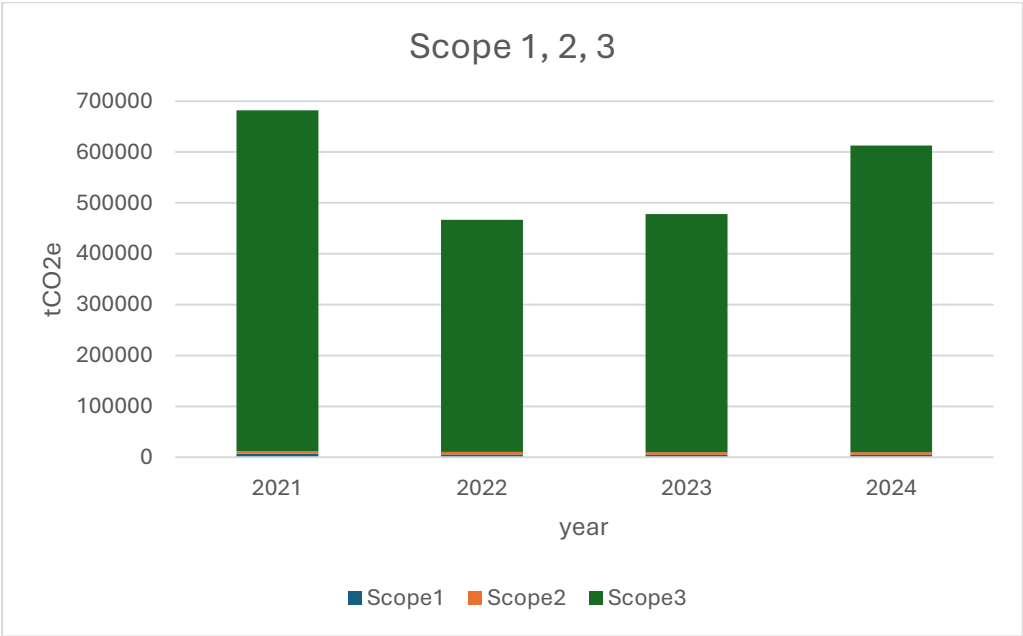


Figure Evolution of the company's carbon footprint in 2021–2024



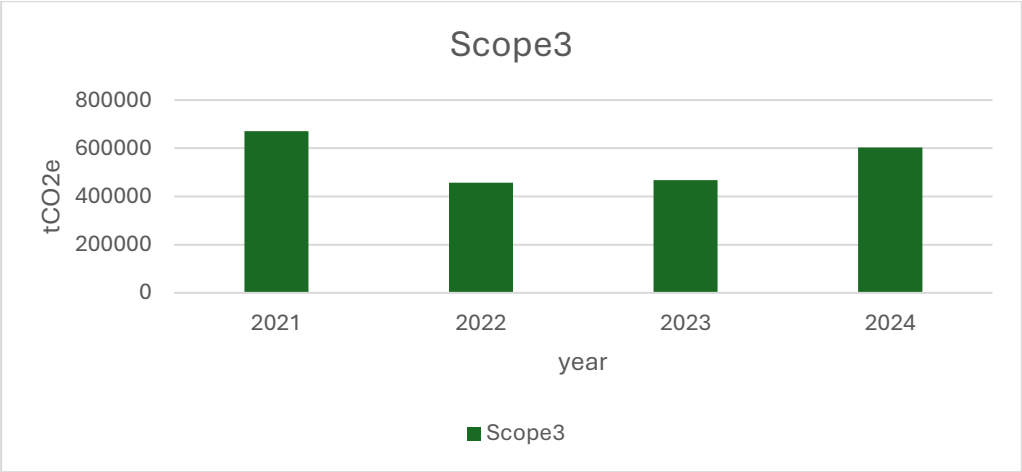


Figure Development of the company's carbon footprint in the Scope3 area in 2021–2024

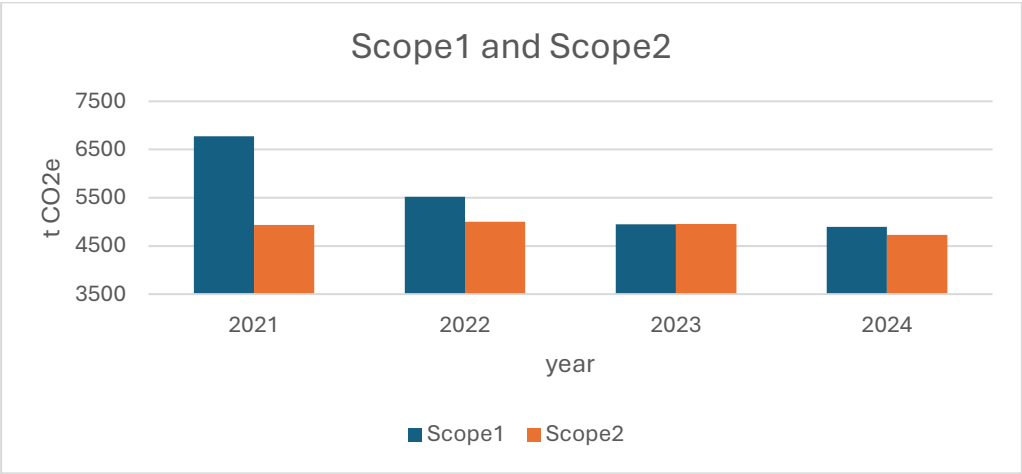


Figure Development of the company's carbon footprint in Scope1 and Scope2 in 2021–2024

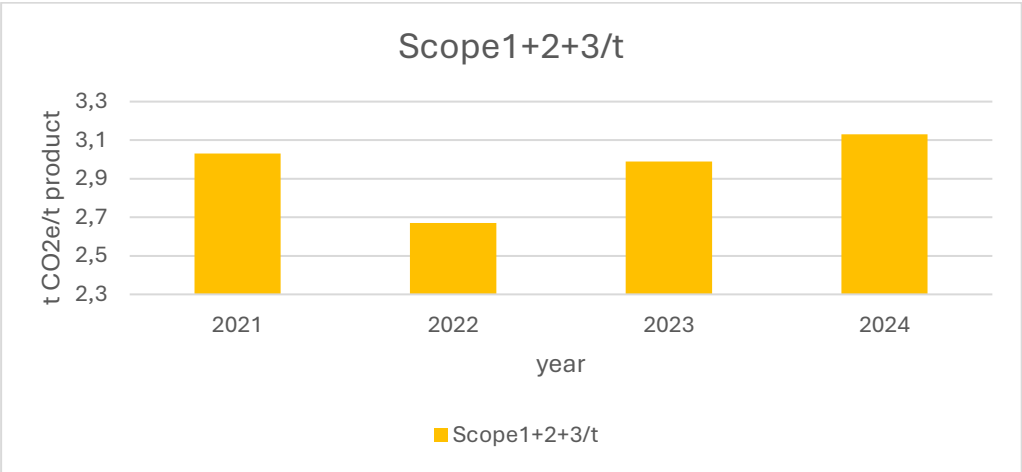


Figure Development of the company's carbon footprint per ton of product in 2021–2024



Our four main emission sources in 2024 included (tCO2e)

1. Purchased goods and services	595,181
2. Transport to the company and distribution (upstream)	6,068
3. Electricity market	4 730
4. Natural gas	4,407

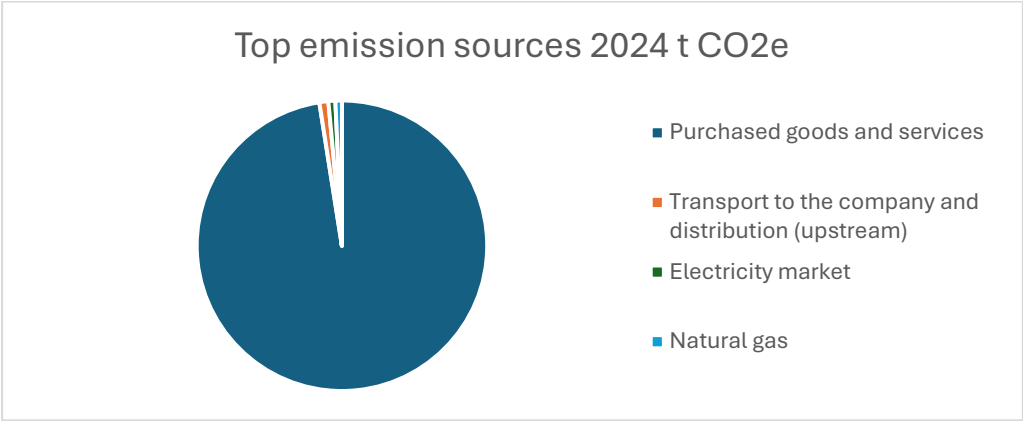


Figure: The company's main emission sources in 2024

The carbon footprint development graph shows that the largest share of the company's total carbon footprint is made up of input materials for production, specifically steel and aluminum coils (strips), which are key raw materials in all of our production processes.

We purchase these materials from reputable suppliers who have a long-standing commitment to sustainability and take environmental aspects into account in their production processes. Most of our suppliers come from European Union countries, ensuring compliance with strict environmental legislation. Some supplies also come from Turkey.

Thanks to the careful selection of business partners, we manage to minimize environmental and legislative risks, especially in connection with emissions from long-distance transport or lower environmental protection standards outside the EU.

Based on these findings, we have developed a Decarbonisation Plan , which sets out specific steps and targets to reduce greenhouse gas emissions across all relevant areas of our business. This plan forms an integral part of our commitment to achieving sustainable operations and is attached to this report as [Annex 1](#).

When assessing materiality, we clarified the impact of our production as well as the risks and opportunities associated with it.

### Impacts, risks and opportunities

Our main impact lies in the carbon footprint that arises during production. This is the carbon footprint of the energy consumed during production, as well as the carbon footprint added by the material.



A solution to these impacts could be purchasing material with a lower carbon footprint, which, however, depends on market demand and, due to the higher price of the material, it is not possible to programmatically switch to this option.

Another possibility for reduction is the use of energy from renewable sources, however, there are production limits on the coil-coating line, which is the main production process of our company. The burning of paint is dependent on natural gas, and it is currently not possible to replace this. The solution to this situation would be to build a new coil-coating line with BAT independent of natural gas. Preparations are currently underway, but it is a matter of several years.

We have identified several climate-related risks, particularly those associated with rising temperatures. These risks include increased costs for maintaining optimal storage conditions for materials, ensuring proper functioning of production equipment that requires specific temperature ranges, and potential impacts on employee health. To mitigate these risks, we have already implemented measures such as installing air conditioning in critical areas and actively managing indoor temperatures to maintain required operational and health standards.

At the same time, climate change also brings opportunities. We see potential for market expansion through the development of products that contribute to climate adaptation and the energy transition. This includes solutions such as window blinds, pergolas, and profiles for mounting photovoltaic panels.

### **The company's most energy and environmentally demanding operation**

The largest environmental and energy burden within the production activities of METAL TRADE COMAX, a.s. is the operation of coating metal coils on a coil-coating line. This technology, common worldwide, is unique in the Czech Republic - MTC is its sole operator.

The process consists of applying coatings on a metal substrate, followed by their curing at high temperature. The emerging volatile organic compounds (VOCs) are captured and subsequently burned through the recuperative combustion of solvent vapors, thereby minimizing hydrocarbon emissions into the air. The thermal energy generated during this process is further used effectively - for example, for heating rinsing water, heating production areas or during the actual coating firing.

The company regularly invests in the modernization of this operation with the aim of increasing energy efficiency, production quality and minimizing environmental impacts. The latest available technologies (BAT – Best Available Techniques) are used, in accordance with the principles of industrial sustainability and the circular economy.

### **Product Life Cycle Assessment and Environmental Declaration**

METAL TRADE COMAX, a.s., has prepared a Life Cycle Assessment (LCA) study for its products from the coil-coating line in accordance with the requirements of the international EPD (Environmental Product Declaration) system. This study was prepared according to the rules of the EPD-PCR product category for construction products and in accordance with the ISO 14025:2006 and EN 15804:2015+A2:2019 standards.





The result is the processing of an EPD for coated metal coils, with the system boundary set using the Cradle to Gate methodology, extended by the end-of-life phase and consideration of the potential for reuse and recycling of materials. These environmental declarations are available through the international database [www.enviromdec.com](http://www.enviromdec.com) and also on the company website [www.mtcomax.cz/udrzitelnost](http://www.mtcomax.cz/udrzitelnost).

In 2023, this documentation was expanded to include a new EPD for shaped products (profiles), thereby responding to growing customer demands for transparency of the environmental impacts of products.

Based on data from 2021, the company's first carbon footprint study was prepared in the scope of Scope 1, 2 and 3. This initial data serves as a reference basis for assessing the environmental performance of products when introducing new technologies and optimizing material and energy inputs.

### **Minimizing the carbon footprint in your own operations**

Although the carbon footprint of METAL TRADE COMAX, a.s. represents a relatively small share (3%) of the total emission load of the product compared to the carbon footprint of input materials, we are actively involved in this area. In cooperation with our suppliers, we map the energy intensity of input materials and try to contribute to reducing the carbon footprint with our purchasing strategy in accordance with customer requirements. We focus on reducing dependence on external energy sources with unsatisfactory environmental parameters by building solar power plants on the roofs of our production and administrative buildings and we work on using waste heat from production.

At the same time, we are implementing a systematic modernization of technological equipment with the aim of increasing energy efficiency and reducing operational demands. These measures are complemented by partial optimization steps that contribute to improving the working environment and overall environmental performance of the operation.

### **Strategy for meeting environmental goals of METAL TRADE COMAX, a.s.**

In order to meet the set environmental and climate goals, which are Reducing greenhouse gas emissions through investments in modern technologies and innovations (*ESRS – E1*) and Gradual transition to clean and renewable energy sources within our operations (*ESRS – E1*), MTC is taking concrete steps towards reducing environmental burden and transitioning to more sustainable operations. The main planned and implemented measures include the following:

1. **Transition to clean energy** – We analyze options for purchasing so-called green electricity, with a focus on increasing the share of electricity coming from low-emission and emission-free sources.
2. **Investments in low-emission technologies** – As part of the projects being prepared, we plan to invest in modern production technologies, such as building a new coil-coating line, as early as 2025.
3. **Use of renewable energy sources** – We are installing photovoltaic systems on the roofs of production and administrative buildings. In 2024, 554.9 MWh of electricity



was produced from photovoltaics, supplemented by battery storage with a capacity of 2 × 100 kW. In the future, we plan to expand the PV system to other buildings on the company's premises.

4. **Waste heat recovery** – We have launched a system for recovering heat from production processes, which is now used to heat administrative and social facilities. Thanks to this measure, we have reduced natural gas consumption in these facilities by 30% this year compared to the previous year.
5. **Energy efficiency of lighting** – The installation of LED lighting in the Service Center hall resulted in a 10% saving in electricity for lighting. In the future, we plan to replace lighting in other operational buildings as well.
6. **Reducing emissions in corporate mobility** – In 2024, we included the first electric car in the fleet as a pilot project. If the evaluation is positive, we will continue to expand electromobility.
7. **Carbon footprint monitoring and measurement** – The carbon footprint is evaluated in accordance with the GHG Protocol methodology using our own carbon calculator. Although some data for 2024 was not available in full, we are actively working to improve data collection and its automation, with the aim of achieving more accurate and efficient monitoring.

Below we present the greenhouse gas emissions of METAL TRADE COMAX, a.s. for 2024, calculated in accordance with the GHG protocol methodology (Scope 1, 2, 3).

### Energy consumption and energy mix (ESRS E1-5)

In previous years, the company used electricity and natural gas in accordance with the energy mix of the Czech Republic. During this period, there have been no purchases of so-called green electricity with a lower carbon footprint. However, we consider this option as one of the opportunities to reduce the emission intensity of our activities.

In the area of direct energy production, we have focused on building our own photovoltaic power plants on the roofs of our operational and administrative buildings. Energy from these renewable sources is already contributing to reducing electricity consumption from fossil fuels. In the future, we plan to expand these capacities with the aim of further improving our energy balance and environmental impact.

*Table Energy consumption, including gas consumption E1-5*

	Quantity (MWh)	Share (%)
Fossil energy consumption	26754.4	88.6
Energy consumption from nuclear sources	2,871.6	9.5
Renewable energy consumption	554.9	1.8
Total energy consumption	30181.0	100

*Table Energy efficiency*

	Consumption (MWh)	Per unit
According to turnover	4.7168	million CZK



## Greenhouse gas emissions (ESRS E1-6)

### Reference year for emissions monitoring

METAL TRADE COMAX, a.s. has set 2021 as the starting (reference) year for monitoring greenhouse gas emissions. This year serves as a basic comparison point for assessing the trend of the company's carbon footprint in the following years and for evaluating the effectiveness of measures taken to reduce emissions.

*Table Total greenhouse gas emissions*

	Base year 2021 (t CO2e)	Previous reporting period 2023 (t CO2e)	Reporting period 2024 (t CO2e)
Scope 1	6,776	4,947	5724
Scope 2 market	4,935	4,564	4,730
Scope 2 location	4,552	4,206	4,154
Scope 3	670 560	467,274	603,582
Total market issues	682,271	476,785	614036
Total emissions location	681,888	476,427	612,460

*Table Emissions outside Scope 1, 2, 3*

	tCO2e
Biogenic CO2 emissions direct	0
Biogenic CO2 emissions indirect from energy consumption	unavailable
Biogenic CO2 emissions indirect other	47

*Table Scope 3 Emissions*

	tCO2e
Purchased goods and services	595 181
Investment property	169
Activities related to fuels and energies not included in Scope 1&2	2036
Transport to the company and distribution	6,068
Waste generated	128
Total	603,582

*Table Emissions value chain*

	tCO2e
Direct company emissions	5724
Purchased energy	4,730
Supply chain	597,521
Indirect transport	6,068

### Data collection and calculation of CO<sub>2</sub> emissions

The amount of CO<sub>2</sub> emissions was determined using a carbon calculator that evaluates input data in accordance with the GHG protocol methodology. Currently, some data is still limited, however, we are working to refine it and gradually automate the collection to ensure the highest quality and completeness of calculations in the future.



Our suppliers’ carbon footprint reporting activities are expanding the availability of Environmental Product Declarations (EPDs), allowing us to replace generic database data with specific emission factors for our actual purchased materials, thereby improving the accuracy of our company’s carbon footprint calculations.

EPDs are not yet commonly available for newly acquired technologies and equipment. Therefore, we only included newly purchased forklifts in the emissions calculation, the data of which was drawn from database sources. As part of improving the working environment and reducing emissions in closed operating areas, we decided to gradually switch to electric forklifts. These can also be powered by energy from our photovoltaic power plants, thereby contributing to a further reduction in indirect emissions.

Significant changes compared to the previous period:

- Purchase of production technology to streamline profile production.
- Testing and application of new coatings on the coil-coating line. Response to legislative requirements (PVdF replacement).
- Solar panel applications.

Evaluating categories as irrelevant:

- Refrigerants – are used only in air conditioning in passenger cars and in some spaces. Their quantity is not significant, but in the future, we would like to obtain this data to make the company's carbon footprint as comprehensive as possible.
- Technological emissions – our technological emissions are not greenhouse gases, therefore they are not reported as part of the carbon footprint, but are listed in the report in chapter E2 [Emissions of pollutants](#). All emissions are within legal limits and are regularly monitored.
- Heat consumption – we use gas for heating and also waste heat from the production process. Gas consumption is already included in energy consumption.
- Purchase of data services
- Use of products and services – our products do not consume electricity, so they were not included in the requirements for calculations in the carbon calculator.

*Table Change in emissions to base year 2021*

	Change (%)
Scope 1	-15.5
Scope 2 market	-4.2
Scope 2 location	-8.7
Scope 3	-10.0
Total market issues	-10.0
Total emissions location	-10.0

Offsets (ESRS E1-7)

In 2024, as in previous years, the company did not purchase any emission allowances or carbon offsets. Our efforts to reduce emissions are focused primarily on technological measures and operational optimization, not on compensation mechanisms.



## E2 Pollution

### Pollutant emissions (ESRS E2-4)

#### Environmental impacts and measures taken

Based on the materiality assessment of our processes, hazardous waste generated during production has been identified as a material topic in the ESRS – E2 area. These wastes are disposed of in accordance with valid legal regulations, but due to their volume represents negative impact on the environment. The amount of this waste is closely linked to the intensity of production and the possibilities for its significant reduction are limited.

Other identified negative impacts are noise and dust. To mitigate these impacts on the surrounding environment, we moved the cargo gatehouse to the other side of the production site, outside the residential area. This significantly improved the situation.

Among the main risks arising from pollution, we also include the possible tightening of legislative limits for the release of emissions into the environment, which may affect our operations.

As part of our response to these risks and to improving the working environment, we have begun replacing our forklift fleet with electric versions that do not emit emissions and can be charged with electricity produced by our own photovoltaic power plants.

An opportunity for us is the introduction of new production technologies, which will allow us to expand our portfolio with innovative products and reach new customers.

In accordance with legislative requirements, we carry out regular emission control measures in production facilities. The measured values are reported annually through the ISPOP system of the Ministry of the Environment.

For 2024, the value of solid pollutants (TZL) was reported at 167.1 kg/year.

*Table Pollutants*

Pollutants			
Substance name	Quantity (kg)	Emission type	Determination method
Total organic carbon (TOC) (as total C or COD/3)	571	Air	Regular measurements
Carbon monoxide (CO), 630-08-0	14,920	Air	Regular measurements
Nitrogen oxides (NOx/NO2)	5,187	Air	Regular measurements
Sulfur oxides (SOx/SO2)	18	Air	Regular measurements

## E3 Water and marine resources

Water (ESRS – E3) is a very essential component in production operations. It is used in the production process itself, mainly for cooling and rinsing, into which it enters after previous adjustments to the required conductivity and hard values necessary for their use. Our negative impact on this area is the high amount of drinking water consumed. An





opportunity for us is the application of new technologies for rinsing and cooling in the operation of the coil-coating line, which is the largest consumer of water. This water is then purified to the required value, before entering the sewer. This was another opportunity for improvement, and thanks to continuous investments in this process, there is now better use of water and more efficient removal of waste substances from it. In January 2023, an investment was made in the automation of the neutralization station (wastewater treatment), which allows the staff to be reduced from five to three and the wastewater treatment process to be made more efficient.

Water consumption by our employees is not significant compared to production, but we are also trying to reduce consumption here.

### Water consumption (ESRS E3-4)

Table Water consumption

	Quantity (m3)
Total water consumption	32,650
Water supply lines	32,650
Surface water	0
Groundwater	0
Total water discharge	32650
Sewer	32,650
Released into the environment	0
Passed on to third parties	0
Total water consumption	0

### E4 Biodiversity and diversity

We did not assess this topic as material to us during the dual materiality assessment, because **we do not have any significant impacts, risks or opportunities in it**. As mentioned above, we found that due to the location of our production plants, we do not have a negative impact on biodiversity and ecosystems (E4) and when expanding, we try to make maximum use of existing areas and not burden the surrounding landscape. Given the effort to reduce dependence on purchased electricity, we decided to build photovoltaic power plants on the roofs of existing buildings, which uses a large area for the creation of solar power plants without burdening the landscape.

We also decided to build apartment buildings that our employees can purchase on preferential terms. These apartment buildings are built on unused land that used to be a storage area and now have a great new use. We paid attention to ecology when building the houses. The houses are low-energy and have an energy certificate of grade A - extremely economical. There is a solar power plant on the roof of each house for the best use of renewable resources.



## E5 Resource use and circular economy

Due to the high volume of purchased materials and raw materials and simultaneously sold products, the area of packaging and packaging materials is an important topic for our company (ESRS – E5). Packaging and its components are systematically recorded, and emphasis is placed on their reuse or effective recycling. As part of quality management, we fully respect the specific requirements of customers for product packaging, and these requirements are consistently implemented and managed within internal processes.

We use environmentally friendly technologies, in accordance with the principles of the circular economy and applicable legislation. As part of packaging optimization, we have previously replaced part of our deliveries with 200 l steel drums with 1000 l IBC containers. This step has *reduced transportation costs* and has had a positive impact on the environment thanks to the reduction in packaging material requirements. After use, IBC containers are handed over to a specialized company for cleaning and refilling, thereby supporting the principles of packaging reuse.

We also implement 100% solvent recycling in our operations – used solvents are regenerated using vacuum distillation and reused in production, which contributes to reducing the volume of hazardous waste and consumption of raw materials.

In order to strengthen the principles of the circular economy, we initiated cooperation with the professional company CYRKL Zdrojová platforma, s.r.o., with whom we consulted on the possibilities of optimizing waste management and streamlining internal flows of packaging materials. Due to current priorities, we have temporarily postponed the implementation of the project, but we continue to plan to expand these activities in the future.

Given the significant volume of packaging waste with recycling potential, we are preparing to implement a more efficient system for recording and managing packaging materials, aiming to improve separation, reuse and recycling rates. Our operations already sort and reuse packaging elements and components, thereby supporting a sustainable circular approach.

Circular economy is one of the priority areas of our environmental strategy, especially with regard to the scale of raw materials consumed and manufactured products.

### Company entries (ESRS E5-4)

As a manufacturing company, the key factor in our carbon footprint is the composition and origin of the input materials, which make up the dominant part of our total emissions. The largest volume of processed materials is aluminum and steel coils, which we further modify through painting, cutting and profiling processes. The resulting products serve as semi-finished products for further processing in various industrial sectors.

Given the breadth of our metal input portfolio and the diversity of our supply sources, it is currently not possible to accurately determine the average recycled content across all material categories. For steel coils, we have determined an average recycled content of approximately 20% based on available data and calculations. This figure reflects the typical composition of the metallurgical products used in our process.



In the case of aluminum coils, the proportion of recycled material varies significantly not only between suppliers but also within different alloys. Given this variability and in an effort not to distort the overall footprint calculation, we have decided not to use any estimated average value for the recycle in aluminum inputs.

In the future, we plan to expand data collection from our suppliers to be able to determine the proportion of recycled material in aluminum with greater accuracy, and thus better manage the environmental impacts of our production activities.

This also falls within our goals, where we have defined:

**Responsible approach to the selection of input materials**, with the aim of preferring materials with a low carbon footprint (ESRS – E5 -4) - We actively cooperate with suppliers who are moving towards carbon neutrality and prefer a circular economy model. We are testing the use of low carbon steel (“green steel”) with the potential to significantly reduce the carbon footprint of our products. Its wider use will depend on market demand due to the higher price of the product.

*Table Total material inputs*

Total quantity (kg)	Of which recycled material (kg)	Recycled material share (%)
193,011,862	35,793,957	19

*Table Main material inputs*

	Total quantity (kg)	Of which recycled material (kg)	Recycled material share (%)
Paper	88,837	88,837	100
Cardboard	42,287	42,287	100
Plastics	38,500	–	–
Steel coil	178 314 167	35,662,833	20
Aluminum coil	12,138,013	x	
Paints	2,302,872	0	–
Foil	2,622	0	–
Bonderite	84,036	0	–
Thinner C 6000	41,650	0	–

*Table Other inputs*

Input name	Input type	Amount	Unit	tCO2e
Forklift	Technique	6	pcs	54.3

## Output from the company (ESRS E5-5)

The service life of our products is determined primarily by the alloy used and the type of surface treatment, with the key factor being the correct selection of material in accordance with the specific conditions of use. Within the framework of customer requirements, we always strive to find the optimal combination that will ensure the longest possible functional service life of the product. An inappropriately selected



material can significantly shorten the product's life cycle and deteriorate its performance in practice.

For products with a painted surface, there is a possibility of local repair in case of minor mechanical damage, using specially designed repair paints. However, these repairs must be carried out immediately after the damage is detected, in order to prevent corrosion and the associated loss of adhesion of the coating to the substrate.

Our other products are highly resistant to normal wear and tear and are not usually susceptible to damage that would significantly affect their service life. In the event of major damage that cannot be repaired, it is necessary to replace the component.

Emphasis on appropriate material selection and repair options contribute not only to extending the lifespan of our products, but also to reducing the environmental burden associated with their replacement or disposal.

### **Product repairability**

The products of METAL TRADE COMAX, a.s., are not currently evaluated according to the repairability score according to the European Union methodology, mainly because most of our products represent input materials intended for further processing in subsequent production processes.

The repairability of the products we supply is not limited in any way - no special spare parts, non-standard tools or unusual procedures are required for repairs. The products are designed with an emphasis on long service life and easy maintenance.

For products intended for final use, especially roof coverings and their components, professional installation or repair by trained personnel is recommended to guarantee quality, to maintain their long-term functionality and to prevent a reduction in service life.

Aluminum roofing is characterized by a very long service life, especially due to its natural resistance to corrosion. Even in the case of gradual loss of color due to long-term exposure to UV radiation, its protective function is maintained thanks to the stability of the metal substrate.

In contrast, steel roofing is more sensitive to environmental influences, and its lifespan is more affected by exposure conditions. For this reason, proper maintenance and timely resolution of any defects are key for steel roofing.

*Table Product Lifespan*

Products	Unit of service life	The company's product life
Painted aluminum coil	years	
Painted steel coil	years	
Steel profile	years	
Aluminum strip/sheet	years	
Steel strip/sheet	years	
Aluminum roofing with PUR/PA surface treatment (55 microns)	years	75
Steel roofing with PUR/PA surface treatment (55 microns)	years	40



*Table Product Recyclability*

Products	Recyclability rate (%)
Aluminum sheet	100
Steel sheet	100

We reuse some packaging that can be reused without reducing product quality, in agreement with customers. These include, for example, wooden pallets or iron boxes.

*Table Packaging Recyclability*

Products	Recyclability rate (%)
Plastic tape	100
Steel tape	100
Wooden pallet	100

## Waste (ESRS E5-5)

Given the significant volume of purchased input raw materials, we consider the area of packaging materials to be a key part of environmental management. Packaging represents a significant share of waste generation and is also one of the factors included in the calculation of the company's carbon footprint. For this reason, we pay maximum attention to their effective use, sorting and possible recycling or reuse.

METAL TRADE COMAX, a.s., is actively working with its suppliers to transition to more sustainable packaging solutions, with an emphasis on minimizing waste while maintaining the protective function and quality of the packaging. A typical example is the supply of steel and aluminum coils, where packaging procedures are being changed in favor of more environmentally friendly options. However, any changes must respect the required level of material protection - in case of a threat to quality, a more suitable alternative solution must be sought.

Another important group is represented by paints, which are supplied mainly in steel drums with a capacity of 200 liters with a plastic liner. After use, the plastic liner is removed, and the drum remains clean and usable. These drums can be purchased by the company's employees for their own needs, which extends their life cycle. After use, the IBC containers that are used are handed over to specialized companies, which then clean them and ensure their refilling, thus supporting the principle of circular packaging management.

These measures are in line with the company's goals in reducing its carbon footprint and the amount of waste produced and form an integral part of the decarbonization strategy and transition to a circular economy.





Table Waste

	Dangerous (kg)	Others (kg)	Total (kg)	Share (%)
Total waste produced	264,079	1,125,082	3,546,536	100
Passed on for further use	–	1,100,774	2,964,151	84
Preparing for reuse	–			0
Recycling	–	1,100,774	2,964,151	84
Other uses	–			0
Submitted for disposal	264,079	24,308	264,079	7
Combustion	264,079		264,079	7
Dump	–	17,149		0
Unknown method of disposal	–	7,159		0





A glass globe is positioned on the left side of the frame, resting on a bed of green grass. The globe is partially covered with white paint, which is peeling and chipped away, revealing the blue and green landscape reflected on its surface. The reflection shows a body of water, green hills, and a blue sky with white clouds. The word "SOCIAL" is written in white, bold, sans-serif capital letters across the center of the globe. The background is a dense field of green grass, with some blades in the foreground being out of focus.

**SOCIAL**



The social area of ESG represents an important part of our approach to sustainable business. We focus primarily on the relationship with our employees, equal opportunities, working conditions, job security and involvement in communities. We consider these aspects to be essential for the long-term stability, loyalty and development of human capital, which is one of the key pillars of our company. Equally important for us is the selection of suppliers that guarantee compliance with legal obligations within their supply and production process. Since we are a manufacturing company, the ESRS – S4 (Customers and end users) item is also material for us.

The topic **of workers in the value chain (ESRS S2)** was not assessed as material based on the analysis performed. Our key suppliers are established companies that already report independently according to ESG standards and apply responsible approaches in the area of human resources management.

All our suppliers and customers are required to comply with the company's Code of Ethics, the content of which they are familiar with. Adherence to these principles is part of the terms of cooperation and contributes to ensuring responsible behavior across the entire value chain.

## S1 Employees and working environment

METAL TRADE COMAX, a.s. strives to create a stable and attractive working environment that is **safe, healthy and supports equal opportunities** (ESRS – S1). We provide employees with conditions for **personal and professional development** (ESRS – S1) through training, educational programs and career growth support. We support an open, transparent and respectful corporate culture based on mutual trust, dialogue and respect between all levels of employees.

At the same time, we strictly follow the applicable legislation of the Czech Republic, including the Constitution and the Charter of Fundamental Rights and Freedoms, and fully respect their principles. We reject any form of discrimination on the grounds of gender, race, ethnic origin, language, faith or religion, political beliefs, social origin, property, health status, age, sexual orientation or other status. We are committed to equal treatment of all employees regardless of their individual characteristics.

Our principles include the prohibition of forced and child labor and respect for the right of employees to fair and dignified working conditions, including fair wages. We recognize that employees are a key element of the success and sustainability of the company, and therefore we emphasize their safety, satisfaction and long-term motivation.

### Occupational safety and working environment

Taking care of the safety and health of our employees is one of the basic priorities of METAL TRADE COMAX, a.s. The occupational safety management system is certified according to the international standard ISO 45001, which sets requirements for a safe working environment and **the prevention of risks and reduction of possible impacts** associated with work with chemical substances and others. Regular training in the field of occupational safety and health (OSH) is a natural part of the corporate culture and takes place in accordance with legislative requirements and internal standards. In



addition to mandatory training, employees are provided with thematic training according to the specific needs of individual workplaces and positions, which supports their professional development and professional qualifications.

We believe that positive interpersonal relationships significantly contribute to a quality working environment. We therefore regularly organize corporate events and team building activities that strengthen teamwork and create a friendly atmosphere in the workplace. These activities are of a sporting or cultural nature to suit the diverse interests of employees, and are organized mainly within individual departments, thereby supporting relationships between closest colleagues. These events have long been very positively evaluated by employees.

As part of employee care, we emphasize two-way communication and open dialogue. As **an opportunity to improve communication**, we decided to use an annual evaluation process through questionnaires filled out by both employees and their superiors. This tool allows us to identify opportunities for improvement, evaluate work performance, expectations and perceived changes. At the same time, it serves as a platform for mutual understanding and further professional development.

Employees are also actively encouraged to submit suggestions, comments or suggestions for possible improvements throughout the year. Constructive feedback is welcome, and any suggestions are handled with the utmost care and respect by management. In this way, we strive to create a motivating, safe and respectful working environment in the long term.

### **Labor force structure and working conditions (ESRS S1-6)**

As of December 31, 2024, METAL TRADE COMAX, a.s. employed a total of 594 people in different working modes. Our priority is to create an inclusive, flexible and supportive work environment that reflects the diverse needs of employees.

Employee structure by type of employment:

- Full-time employment: 578 employees
- Part-time work: 16 employees

The company actively supports flexible forms of employment, especially for employees caring for children, people with health limitations, or those who prefer shorter working hours for other personal reasons.

Gender balance:

In the group of technical and administrative workers, the ratio of men to women is balanced, which we assess as **a positive impact** on our employees and the overall corporate culture.

The workforce in manufacturing occupations is predominantly male, reflecting the physically demanding nature of the work in the plant. However, the company ensures equal opportunities in the recruitment and development of all employees, regardless of gender or other characteristics. **An opportunity** to facilitate physically demanding work



could be the automation of processes, but given the long-term cost-benefit analysis, the risks and benefits of this solution need to be assessed.

#### Employment of people with disabilities:

The company does not exclude any applicants due to health limitations. We strive to create safe and accessible working conditions for people with disabilities, and within operational capabilities, we adapt the working environment to them.

A more detailed overview of the workforce structure is provided in the attached tables.

*Table Number of employees, types of work hours S1-6*

	Men	Women	Other	Not specified	Unknown	Total
Total	418	176	–	–	–	594
Permanent employees	355	145	–	–	–	500
Temporary employees	63	29	–	–	–	92
Employees with non-guaranteed working hours	–	2				2
Full-time employees	417	161	–	–	–	578
Part-time employees	1	15	–	–	–	16

#### Methodology:

- The total number of employees is listed according to the number of people.
- The total number of employees is shown at the end of the period.
- The number of employees according to the duration of the contract is given according to the number of people.
- The number of employees by contract duration is shown at the end of the period.
- The number of full-time employees is given according to the number of people.
- The number of full-time employees is shown at the end of the period.

*Table Employee turnover*

Number of employees who left the company during the reporting period	66
Employee turnover rate for the period	12.9

*Table Disability*

	Men	Women	Other	Total
Proportion of employees with disabilities	1.2	2.8	–	1.7

This information falls under ESRS requirement S1, S1-12. Diversity is included only in the Czech Republic. Other data are unavailable.



## Labor force excluding employees (ESRS S1-7)

In addition to our core employees, we also use agency workers to meet some operational needs. These workers are integrated into regular operations in compliance with all legal requirements and in accordance with the company's internal standards for safety, health protection and fair working conditions.

Detailed data on the extent of the use of agency labor are presented in the following table.

METAL TRADE COMAX, a.s., emphasizes equal treatment for all people working on its premises, regardless of their contractual status. Our goal is to ensure a safe, fair and dignified working environment for all cooperating employees.

*Table Non-employee workers*

Non-employees	Number
Self-employed	0
Agency workers	1
Hoarfrost	0
Total	1

## Collective agreements (ESRS S1-8)

METAL TRADE COMAX, a.s., currently does not conclude collective agreements with its employees. However, it emphasizes open dialogue and transparent communication between management and employees. Employees have the opportunity to freely express their views on their working conditions, actively participate in their improvement and contact their superiors with suggestions or proposals.

Internal communication channels and regular evaluations allow us to create a working environment based on mutual respect and trust.

## Diversity in corporate leadership (ESRS S1-9)

METAL TRADE COMAX, a.s., supports equal access and fair opportunities at all levels of management. When filling management positions, we place emphasis primarily on the expertise, experience and competence of individuals, regardless of their gender or other personal characteristics.

- **The company's senior management** is 60% male and 40% female, reflecting our commitment to equal opportunities and inclusiveness.
- **The Supervisory sheet**
  - is composed exclusively of women (100%), which demonstrates the high level of female representation in the company's supervisory bodies.
- **Board of directors** consists of three members, all of whom are men (100%). However, creating equal opportunities for the future development of diversity in the highest management bodies remains our long-term priority.





We understand diversity as a benefit that increases the quality of decision-making and supports sustainable growth of the company.

*Table Diversity Management*

	Men	Women	Other	Total
Number of management members	9	6	–	15
Share in management (%)	60	40	0	100

*Table Age distribution of governance*

	Under 30 years old	30-50 years	Over 50 years old	Total
Number	0	9	6	15

This information falls under ESRS requirement S1, S1-9

*Table Age distribution of employees*

	Under 30 years old	30-50 years	Over 50 years old	Total
Number of employees	67	285	159	511

This information falls under ESRS requirement S1, S1-9. Diversity is included only in the Czech Republic. Other data are unavailable.

### **Decent wages (ESRS S1-10)**

METAL TRADE COMAX, a.s. does not set a specific internal limit for a reasonable wage, however, all our employees receive a wage higher than the legally established minimum wage in the Czech Republic.

Wages are determined with regard to the job position, qualifications, performance of the employee and the current situation on the labor market. We regularly monitor developments in the field of remuneration and strive to ensure that our wage policy is competitive and fair, thereby contributing to employee satisfaction and stability. Social protection (ESRS S1-11)

All employees of METAL TRADE COMAX, a.s. are duly registered with the social security system in accordance with the legislation of the Czech Republic. This includes health insurance, pension insurance, sickness insurance and unemployment insurance.

Employees have access to statutory social protection benefits, such as sickness benefits, nursing care, maternity and parental leave, pension security and unemployment support.

The company also provides employees with various benefits beyond legal requirements that contribute to their social security and overall well-being, such as contributions to pension insurance, company meals, vacation beyond the legal limit, or contributions to leisure activities.

Social protection also applies to part-time employees and workers with specific needs, to whom we strive to provide adequate facilities and adapted working conditions.



Table Coverage of all employees by social protection in the following topics

Country	Disease	Unemployment	Work-related injury or acquired disability	Parental leave	Retirement
Czech Republic	YES	YES	YES	YES	YES
Slovakia	YES	YES	YES	YES	YES

## Education and professional development of employees (ESRS S1-12)

METAL TRADE COMAX, a.s., emphasizes continuous education and professional growth of its employees as an integral part of strategic human resources management. All employees regularly undergo mandatory training in accordance with applicable legislation, especially in the areas of occupational safety, health protection and other professional areas related to the performance of their work activities.

In addition to legal obligations, the company also provides above-standard forms of education - professional courses, seminars, conferences and individual consultations, which reflect the specific needs of individual job positions and contribute to deepening the professional competence of employees.

In this way, we support not only personal and professional development, but also the long-term employability and adaptability of the workforce, which is in line with the goals of sustainable development and the requirements for a qualified workforce within high-value-added industries.

## Pay gap (ESRS S1-13)

With a view to fair and transparent remuneration of employees, a new wage policy was introduced as of January 1, 2022. As part of this restructuring, tariff classes were implemented that reflect the level of qualification, professional competence and length of experience of individual employees. Each employee is assigned to the appropriate category and wage class based on objective and predefined criteria.

This step was **an opportunity** to increase internal fairness in remuneration, support equal opportunities for professional growth, ensure transparent career and wage development, and at the same time motivate employees to improve their qualifications. The introduction of tariff classes also contributed to reducing turnover in jobs with a higher level of staffing requirements and overall led to the stabilization of work teams.

The change in wage policy has significantly strengthened the competitiveness of METAL TRADE COMAX, a.s. as an employer on the labor market and supports a long-term sustainable approach to human resources management in accordance with the principles of equality and fair remuneration set out in the ESRS regulation.

## Health and Safety (ESRS S1-14)

Working conditions at METAL TRADE COMAX, a.s. fully comply with the requirements of the Labor Code and related legislation of the Czech Republic in the field of safety, health protection and occupational hygiene.

The company has implemented an occupational health and safety management system in accordance with the international standard ISO 45001, which is regularly updated and adapted to operational risks. The aim of this system is to create a safe working environment, prevent occupational accidents and diseases, and improve working conditions overall.

All employees in Velvary have access to a company doctor directly at their place of work, which supports timely health care and prevention.

Occupational health and safety are also regulated by Act No. 309/2006 Coll., which sets out additional requirements for ensuring safety, and subsequently implementing regulations. This framework applies to all employees without distinction.

Employees are regularly and demonstrably trained in the field of health and safety, both upon employment and repeatedly according to the internal training plan and legal deadlines. Education and awareness in the field of safety is adapted to the nature of the job position and current risks in the workplace. The aim is not only to fulfill legal obligations, but above all to actively prevent risks and support a culture of safety throughout the organization.

*Table Percentage of own workers covered by the health and safety management system*

Total share (%)	100
-----------------	-----

*Table Occupational accidents*

Number of work accidents	11
Occupational injury rate (per million hours)	15.35407902

*Table Occupational diseases*

	Staff	Workers who are not employees	Former employees and other workers
Number of cases of work-related illnesses	0	0	0

*Table Work absence - Number of days of absence from work due to work-related injury or illness*

	Staff	Workers who are not employees
Calculation by calendar days	590	0



Table Work-related deaths

Number of deaths due to:	Own workforce	Suppliers working at the company's workplace
Work accidents	0	0
Work-related illnesses	0	unavailable
Total	0	0

### Work-life balance (family leave) (ESRS S1-15)

METAL TRADE COMAX, a.s. actively supports the work-life balance of its employees. We realize that balancing work responsibilities with family and personal life is key to the long-term satisfaction, health and performance of employees.

Employees can take leave for family reasons in accordance with applicable legislation, especially the Labor Code. In practice, we enable flexible solutions to these situations - we support the use of parental and maternity leave, offer the possibility of individual work schedule, or use of part-time jobs or work from home, if the nature of the work allows it.

The company also accommodates employees in the event of unplanned life events and supports a human and supportive approach by managers in addressing individual needs. The goal is to create a long-term sustainable working environment with respect to the personal needs of employees.

Table Entitlement and use of leave for family reasons

Share of employees with entitlement	86.0
Share of employees with a claim	5.4

Table Employees who claimed leave for family reasons: share by gender

	Men	Women	Other	Not specified	Unknown
Share of employees	18.8	81.3	–	–	–

### Discrimination, working conditions and human rights (S1-17)

METAL TRADE COMAX, a.s. applies the principle of zero tolerance towards any form of unlawful discrimination, harassment or unequal treatment. Equal access is ensured across all personnel processes – from recruitment, through daily work activities to employee development and career growth.

Employment decisions are not influenced by gender, race, nationality, ethnic origin, age, health status, religion, sexual orientation, family status or other characteristics that are not related to the performance of the job. Incidents and complaints regarding discrimination and equal treatment

During 2024, no cases of discrimination, harassment or other violations of equal treatment were recorded at METAL TRADE COMAX, a.s. The company also did not register any formal complaints regarding working conditions or social aspects of the employment environment.



At the same time, no incidents related to human rights violations were reported in 2024. We consider compliance with the fundamental rights of employees to be an integral part of our corporate culture and all our activities. We have internal rules and procedures in place that support the prevention of discrimination and ensure equal access to all people regardless of their personal or demographic characteristics.

## S2 Workers in the value chain

Based on the dual materiality analysis performed, the topic of impacts on workers in the value chain (ESRS – S2) assessed as **significant**. METAL TRADE COMAX, a.s. cooperates primarily with suppliers based within the European Union, who themselves are subject to strict regulatory requirements in the areas of working conditions, human rights protection and the environment.

These suppliers are established and trusted entities that have already implemented appropriate risk management processes and often regularly disclose non-financial information themselves. When selecting and evaluating our suppliers, we pay attention to compliance with legal regulations, ethical principles and environmental standards, and we prefer partners who strive to minimize negative impacts on affected communities and support long-term sustainability.

## S3 Affected communities

METAL TRADE COMAX, a.s. is fully aware of the impact of its activities on the surrounding communities and actively strives to reduce any negative impacts that have arisen from the materiality assessment (ESRS – S3). In accordance with the requirement of ESRS 2 SBM-3, we identify and manage significant impacts on local residents, primarily in the areas of noise pollution and dust associated with the operation of production facilities and logistics.

### Identified impacts

Due to the nature of the production process, the processing of metal coils and their transport by truck or rail, there is increased noise pollution in the vicinity of the operation and also local increase in dust.

### Measures taken

To minimize these impacts, we have implemented the following steps:

- Moving the freight gatehouse to the opposite side of the Velvary area, closer to the edge of the village and further from residential areas, which reduced traffic congestion near the houses.
- Regular noise and dust measurements, which provide us with feedback and allow us to plan further steps for improvement.



## **Collaboration with the community**

We actively communicate with the surrounding communities. They contact us with suggestions and requests, which we assess and address where possible. In addition to directly addressing impacts, we also support regional initiatives over the long term, both through donations and partnerships, and through direct support for employees and their families.

### **Examples of community support**

- Support for local schools, sports and cultural events.
- Contributions to extracurricular activities for employees' children.
- Cooperation with municipalities in planning and organizing infrastructure around the establishments.

## **S4 Customers and end users**

The company METAL TRADE COMAX, a.s., has traditionally operated as a manufacturer of semi-finished products from metal materials, which are in most cases further processed in downstream production chains. For this reason, the topic of impacts on customers and end users has not been assessed as material in the past.

However, due to the increasing volume of direct sales of roofing materials and their components to end customers, this is changing. Based on the new dual materiality assessment for 2024, we have decided to include the topic of impacts on customers and consumers (ESRS – S4) among the material topics.

The main customer expectations are related to:

- the quality and correctness of product processing, which directly affects the safety, functionality and long service life of roofing systems,
- flawless application of roofing, which ensures the protection of the consumer's property,
- quick and professional handling of complaints, if they exceptionally occur.

### Quality measures and management

In order to eliminate complaints and ensure long-term customer satisfaction, we apply strict quality management systems according to ISO standards. Each product is subjected to thorough quality control. We offer our customers direct assembly as part of the order, and we also train our customers to ensure a quality product for customers.

### Complaints process

If a complaint occurs, it is immediately recorded and resolved through the technical support department, professionally assessed by a qualified employee, and then handled as soon as possible with an emphasis on minimizing the impact on the customer.





A close-up, low-angle shot of tall, green grass. The grass blades are long and slender, with some showing signs of being cut or broken. The background is a dense field of similar grass, slightly out of focus. The word "GOVERNANCE" is overlaid in the center in a white, bold, sans-serif font.

# GOVERNANCE



Corporate governance is the fundamental framework for transparent, ethical and responsible business. In our company, we emphasize strong internal control mechanisms, a clearly defined organizational structure, compliance with legislative requirements and the application of ethical behavior principles across all levels of management.

Our approach to good governance also includes maintaining a transparent relationship with stakeholders, effective risk management and ensuring compliance with regulatory frameworks, including the requirements of the CSRD. The company's Code of Ethics forms a binding framework for the conduct of employees, suppliers and business partners and is regularly updated.

We understand the principles of good governance as an integral part of building credibility, stability and long-term sustainability of our business.

### Governance, risk management and internal control (ESRS G1-1)

The company METAL TRADE COMAX, a.s. is managed in accordance with the principles of corporate governance of a joint stock company. The statutory body is the Board of Directors, while supervision is carried out by the Supervisory Board. The management structure ensures accountability to a wide range of stakeholders, including shareholders, employees, customers, suppliers, financial institutions and state authorities.

#### **Management systems and internal control**

The company's management is based on an integrated management system, which includes:

- quality management system (including ISO 9001 and IATF 16949),
- environmental management (ISO 14001),
- OHS management system (ISO 45001),
- energy management (ISO 50001).

These systems are maintained and continuously developed through internal and external audits, which support systematic improvement and transparency within corporate governance.

The following audits were carried out in 2024:

- 21 internal system audits covering all areas of integrated management,
- 2 process audits at operations certified according to automotive industry requirements,
- 9 product audits focused on product compliance with customer specifications and expectations.
- 27 external audits conducted by certification bodies, government agencies and customers.

Internal audits provide independent verification of the effectiveness and compliance of processes with set standards and contribute to the management of operational and ESG risks. These audits confirm compliance with legislative requirements, industry standards and commitments to stakeholders.



## **Risk management**

The company has implemented mechanisms for identifying, assessing and managing risks, including ESG risks. Risk management is an integral part of decision-making processes across management levels and is supported by internal control tools and transparent documentation.

A well-established management and control system at METAL TRADE COMAX, a.s., contributes to increasing resilience, reducing operational risks, supporting ESG objectives and sustainable company performance. Governance and internal control mechanisms are the fundamental pillars of our credibility with stakeholders.

## **Code of Conduct and Ethical Principles**

METAL TRADE COMAX, a.s. applies high ethical standards in all its business activities, relationships with employees, partners and other interested parties. The Code of Conduct is of fundamental importance, which sets out the basic rules and principles of conduct in accordance with legal regulations and corporate ethics.

Compliance with these principles is mandatory for all employees, and we also require compliance with these principles from our suppliers, regardless of whether they are located within or outside the European Union.

The ethical framework is supported by the implementation of internal policies, control mechanisms and process systems that are designed to identify, prevent and address ethical and legal risks across the entire supply chain.

The Code of Conduct is regularly reviewed and updated to reflect developments in legislation, international standards and stakeholder expectations in the areas of sustainability, responsible business and ESG.



**Ethical and well-Intentioned  
with strict adherence to the law**

Honesty and equality  
towards customers

Declared quality  
deadline accuracy

Selection of suppliers according to  
the rules of commercial competition

Confidential information  
about supplier relationships

Respect and dignity  
towards employees

No unlawful discrimination

Interests of the wider community

Truthful communication  
with government authorities

Improving the quality  
of the environment

Respect for standards for waste,  
emissions, etc.

Competing vigorously but fairly

Does not use restrictive  
business practices

## Privacy, data protection and cybersecurity

METAL TRADE COMAX, a.s. approaches the protection of personal data, confidential information and cybersecurity with maximum responsibility. As part of its information security management strategy, it has implemented an information security management system (ISMS), which is based on the principles of prevention, assessment and controlled risk reduction.

The objective of the ISMS system is:

- identification and management of potential threats and vulnerabilities in the field of information security,
- ensuring the confidentiality, integrity and availability of all processed data,
- setting up organizational structures, responsibilities and rules in accordance with the requirements of legislation and international standards,



- data protection in the areas of human resources, physical infrastructure, ICT systems and supplier relationships.

The ISMS is managed and assessed according to the VDA ISA (Information Security Assessment) system. In 2024, we successfully obtained the TISAX (Trusted Information Security Assessment Exchange) label, which confirms our commitment to a high level of cybersecurity, especially within the automotive industry and B2B relationships.

We ensure that all activities related to the processing of personal and sensitive data are in compliance with the GDPR and related legislation. Employees undergo regular training in cybersecurity and data protection to ensure a high level of awareness and responsibility.

Data protection and information security are an integral part of our ESG strategy and one of the key pillars of credibility with customers, partners and other stakeholders.

### **Customer satisfaction**

METAL TRADE COMAX, a.s., emphasizes active customer relationship management and systematic monitoring of customer satisfaction. As part of stakeholder relationship management, we regularly evaluate customer needs and expectations, which we then consider when developing products, optimizing production processes, and setting up business services.

Our customer strategy is based on:

- a wide network of sales representatives who ensure direct and regular communication with customers,
- connection of the sales and production departments, which allows us to respond quickly and effectively to individual client requirements,
- consistent customer support, focused on technical assistance, complaint resolution, and provision of documentation and certifications.

Customer feedback is a key tool for identifying opportunities for improvement and innovation. Based on inquiries, comments and requests, we regularly expand our product portfolio, implement new standards (including certifications) and adapt production and service processes.

We have implemented an internal customer satisfaction assessment system for satisfaction management, which defines clear procedures for data collection, analysis and subsequent use in strategic decision-making. The results of this system help us improve overall performance and maintain long-term and stable relationships with key partners.

Customer satisfaction is understood as one of the pillars of our company's sustainability and competitiveness, as well as a significant factor in managing risks and opportunities within the value chain.

Within the framework of the integrated management system, METAL TRADE COMAX, a.s. emphasizes ensuring business continuity as a key element for resilience, sustainability





and long-term performance. Business continuity management is systematically integrated into the overall framework of risk management and internal control.

A business continuity strategy includes:

- identification and evaluation of risks and threats that may negatively affect key business processes,
- definition of critical activities, resources and systems whose protection and restoration are a priority,
- setting up recovery plans (Business Continuity Plans), which set out specific measures including alternative procedures and locations,
- division of responsibilities that ensures a quick and effective response in the event of a disruption to operations.

Business continuity plans are regularly tested, reviewed and updated to reflect the current organizational structure, operational changes and external conditions. The company also monitors developments in the supply chain and business environment to be able to respond flexibly to potential outages or emergencies.

This approach ensures that the company is able to minimize the impacts of disruptions, protect the interests of key stakeholders, and maintain the trust of customers, employees, and partners.

Business continuity management is understood as a dynamic and continuously improved process that supports both short-term operational stability and the company's long-term resilience to external and internal risks. Supplier Selection and Management (ESRS G1-2)

METAL TRADE COMAX, a.s. emphasizes a responsible approach to supply chain management. We purchase most of our input raw materials and materials from verified and trusted suppliers, mainly within the European Union. This approach not only reduces environmental and social risks associated with logistics and legislative incompatibility but also ensures greater transparency and compliance with standards in the areas of human rights, working conditions and environmental responsibility.

The supplier selection process is governed by formal policies and procedures that ensure that new business partners meet the company's quality, ethics and compliance with applicable legal requirements. As part of the so-called pre-approval process, potential suppliers are evaluated based on:

- their business credibility and financial stability,
- quality of the working environment and management of production operations,
- ability to comply with legislative requirements, including rules in the field of health and safety, environmental policy and labor law,
- compliance with products and services with applicable technical norms and standards.

After establishing cooperation, the performance and reliability of suppliers are regularly monitored. We evaluate compliance with contractual terms, timely deliveries, material quality, approach to resolving complaints, and proactive approach to environmental and social aspects.



Our supplier relationships are based on mutual trust, transparency and long-term cooperation. We are open to feedback and suggestions from our business partners and together we strive for continuous process improvement throughout the value chain.

### Whistleblower Protection

- The company is subject to the Whistleblower Protection Act.
- The whistleblower system is activated for internal whistleblowers.
- The whistleblower system is activated for external whistleblowers.



Whistleblowing.pdf

As part of risk management in the area of ethical conduct and prevention of corrupt practices, METAL TRADE COMAX, a.s., has identified selected positions with a higher risk of occurrence of corrupt practices (in accordance with ESRS G1-1). These positions were selected based on a risk analysis that considers access to commercially sensitive information, decision-making powers in the areas of purchasing, sales, tendering procedures and external contractual relations. The identified risk functions are listed in the following table:

In 2024, there were no confirmed cases of bribery, corruption or other unethical conduct in accordance with the ESRS G1-4 requirement.

The company is aware of the importance of prevention in this area but currently does not have specific training programs implemented focused exclusively on the issue of combating bribery and corruption (ESRS G1-3). However, in connection with the development of the risk management system, we plan to strengthen the education of employees, especially those in risky positions, in the form of targeted training on the code of ethics, including compliance and anti-corruption behavior.

Table Risk functions in terms of bribery

Position name	Number of employees
Purchasing Manager	2
Business Manager	5
Sales representative	17
Purchasing Manager	1
Store Manager	3
Director	15

### Business Ethics: Sponsorship, Donations and Contributions (ESRS G1-5)

In 2024, METAL TRADE COMAX, a.s. provided financial contributions in the areas of sports, culture and youth support, in line with its long-term strategy of social responsibility and regional engagement.



These contributions were focused on non-profit projects and activities that support a healthy lifestyle, leisure activities for children and youth, and the development of community life in our region. They were not political contributions, but exclusively to support publicly beneficial activities.

This area falls below the requirements of ESRS G1-5, and its transparent reporting helps strengthen trust between the company and its stakeholders.

*Table Political and other contributions*

	Financial donations and contributions (CZK)	Monetary value of in-kind contributions and services (CZK)
Contributions to other recipients	1,089,200	-

Within ESRS G1, G1-5, we report on the participation of members of administrative and management bodies in public administration.

*Table Members of administrative and management bodies who held a comparable position in public administration in the last two years*

Member of the administrative or management body of a company	Title of position in public administration	Position terminated
Blanka Vaigeltová	Representative of the municipality of Uhy	NO

## Business Ethics: Payment Processing and Payment Deadlines (ESRS G1-6)

In accordance with the requirements of ESRS G1-6, METAL TRADE COMAX, a.s. records and monitors payment terms towards its suppliers. Payment terms are defined within the contractual arrangements and correspond to common industry standards.

Payment terms include various invoice maturity options: 14, 30, 45, 60, 75 and 90 days, with the most commonly used maturity period being 45 days.

A detailed overview of payments and their processing is provided in the table below, which documents the actual payment durations and thus helps ensure transparency and a responsible approach to managing financial obligations.

*Table Payment Processing*

Average time to pay an invoice (days)	32
Number of days for payment determined by payment terms (days)	45
Percentage of payments made within the payment terms (%)	99
Number of ongoing legal proceedings regarding late payments	0



For METAL TRADE COMAX, a.s., long-term and transparent cooperation with business partners in the supply chain and with public institutions is key, as is the satisfaction of our employees. We are convinced that mutual synergy and a partnership approach are essential for the successful fulfillment of sustainable development goals, and together we can achieve better results faster and more effectively.



# Appendix No. 1

## Decarbonization plan of METAL TRADE COMAX, a.s.

In accordance with the objectives of the Paris Agreement (2019) and applicable legislation, METAL TRADE COMAX, a.s., is committed to systematically reducing its carbon footprint, both within its own operations and its products. This commitment is based on our long-term strategy of sustainable development and a responsible approach to the environment. Currently, this is an initial draft of the direction of the decarbonization plan, which will be further developed and continuously updated next year.

### Key approaches and measures

- **Innovation of production technologies and processes** with the aim of increasing efficiency, quality and meeting increasingly strict legislative and customer requirements.
- **Minimization of technological waste** through modernization and optimization of production.
- **Improving the working environment and energy efficiency of buildings**, including insulation projects, replacing lighting with LED technology and utilizing waste heat from production processes.
- **Maximizing waste separation and recycling**, supporting the reuse of packaging materials and working with customers to return them.
- **Increasing the share of renewable energy sources**, especially photovoltaic power plants on the roofs of buildings, up to covering own consumption, including the acquisition of battery storage.

### Carbon footprint context

Given the nature of our products – painted and shaped aluminum and steel coils – a significant part of the total carbon footprint is the carbon already contained in the input materials. The production process itself represents a smaller share of the total emissions, yet its optimization is a key part of our decarbonization strategy.

### Our four main emission sources in 2024 included (tCO<sub>2</sub>e)

Purchased goods and services	595 181
Transport to the company and distribution (upstream)	6 068
Electricity market	4 730
Natural gas	4 407





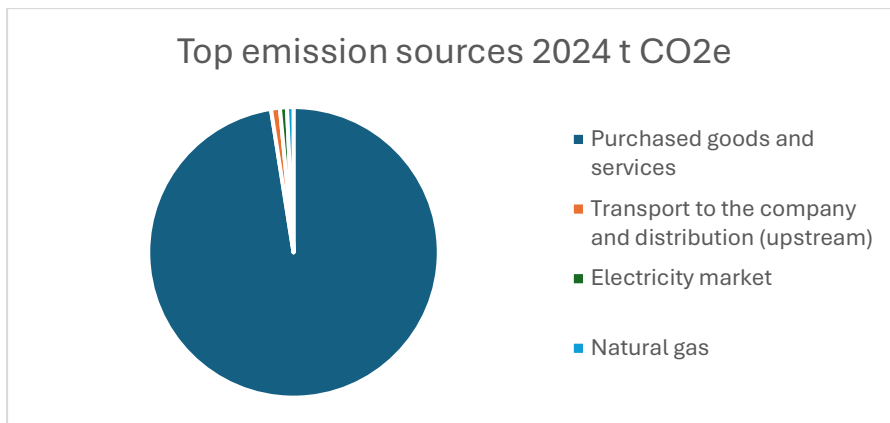


Figure The company's main emission sources in 2024

## Planned steps and areas with the highest potential for emission reductions

### 1. Input materials with a lower carbon footprint

- For steel, we are considering the possibility of purchasing so-called *green steel* with significantly lower CO<sub>2</sub> emissions. Given the limited availability and higher price, the implementation of this step will depend on the company's strategy and customer requirements. We plan to increase customer awareness of this option, especially in the automotive sector and among manufacturers of building components, where stricter legislation requires a lower carbon footprint for buildings.
- We actively seek suppliers offering materials with a lower carbon footprint even at an increased purchase price, thereby supporting the reduction of Scope 3 emissions.

### 2. Transport optimization

- Increasing the share of rail transport and using modern, emission-efficient trucks.
- Continuous monitoring of new technologies and logistics solutions with lower emissions.
- Gradual expansion of the company's fleet of electric cars with the possibility of charging them from its own photovoltaic sources.

### 3. Reducing emissions from electricity

- Expanding the capacity of photovoltaic power plants on the roofs of production halls to cover 100% of self-consumption.
- Acquisition of battery storage for efficient use of generated electricity.
- By mapping the market, we will prepare for the purchase of electricity with a more favorable emission factor, which we will implement if necessary and favorable market conditions arise.

### 4. Natural gas consumption and production modernization

- The modernization of the boiler room has already resulted in a reduction in gas consumption.



- The largest gas consumption remains in the firing of coating systems on the coil-coating line; switching to pure electric energy is not technically feasible here.
- We are planning to build a new coil-coating line using BAT (*Best Available Technology*), which will enable more efficient gas combustion, lower gas consumption and waste heat recovery. Construction will be carried out between 2026 and 2028.
- This modernization will also contribute to reducing air emissions and water consumption.

## Monitoring, objectives and verification

- Since 2019, we have been conducting detailed carbon footprint analysis for Scope 1 and Scope 2; since 2021, we have also been monitoring Scope 3.
- We are continuously improving the quality of data collection to more accurately identify opportunities to reduce emissions.
- The decarbonization plan is in line with the SBTi initiative and sets emission reduction targets by 2030.
- An Environmental Product Declaration (EPD) has been prepared and verified for our products, confirming that the largest share of the carbon footprint is represented by input materials.

Table Data from the SBTi Goal Setting Tool

	Base year (2021)	Current year (2024)	Target year (2030)	% Reduction to date	% FLA adjustments	% SBT reduction
Scope1 emissions (tCO <sub>2</sub> e)	6,776	4,895	3,922	27.76%	0.13%	42.13%
Scope2 emissions (tCO <sub>2</sub> e)	4,935	4,244	2,862	4.16%	Not required	42.00%
Scope1+2 emissions (tCO <sub>2</sub> e)	11,711	9,139	6,784	17.81%	0.07%	42.07%
Scope 3	Base year (2021)		Target year (2030)		% SBT reduction	
Physical intensity (tCO <sub>2</sub> /t)	2.7		1.3		51.60%	





## METAL TRADE COMAX, a.s.

273 24, Velvary 420, Czech Republic

tel.: +420 315 730 111 | e-mail: [info@mtcomax.cz](mailto:info@mtcomax.cz) | [www.mtcomax.cz](http://www.mtcomax.cz)



[www.mtcomax.cz](http://www.mtcomax.cz)