SUSTAINABILITY APPROACH

SOLID FOUNDATIONS

Metinvest is dedicated to incorporating sustainability into its business practices. The Group's resilience is strengthened by a robust framework supported by comprehensive policies and regular stakeholder engagement, which drive strategic ESG initiatives.

COMMITMENT IN PRACTICE

Metinvest implements its sustainability agenda in alignment with the principles set forth in the SCM <u>Sustainability Policy</u>, shaping the commitment to sustainable development and promoting ethical business conduct. In accordance with the document, Metinvest is guided by the following principles:

Take a whole system approach

The concept of sustainable development is embedded into the Group's business strategy.

Work efficiently and effectively

Metinvest improves its business processes and procedures, uses resources sustainably and looks for new business development opportunities.

Respect interests of partners, customers and society

The Group respects the interests of partners, customers and society and builds relationships with them founded on the principles of integrity, honesty, openness and mutual trust.

Provide good and safe working conditions

Metinvest recognises that its employees are its most important asset. The Group is committed to providing them safe working conditions, competitive remuneration and social benefits.

Respect human rights

The Group respects and observes human rights and freedoms and has zero tolerance for discrimination.

Improve living standards in local communities Being a responsible business, Metinvest contributes to raising the living standards and

contributes to raising the living standards and promoting sustainable development in the regions where it operates.

Commit to preventing and reducing the environmental footprint

The Group is committed to continuously make efforts to reduce its environmental impact.

Overall, Metinvest's sustainability agenda is structured around the ESG principles identified through an assessment of material issues. These areas underpin Metinvest's sustainability projects and initiatives, providing a unified strategic framework.

As regulations for non-financial reporting continue to evolve, the Group is preparing diligently towards CSRD and ESRS compliance.

Metinvest expects it will be in the second wave of companies under the CSRD and the Group anticipates preparing its first ESRS-aligned report in 2028, based on data for the financial year ending 31 December 2027. This timeline may be adjusted following the final adoption of proposed simplifications of the EU's sustainability reporting framework.

In the meantime, Metinvest's preparatory actions include Double Materiality Assessment (DMA) and an analysis to check whether it meets ESRS requirements. These efforts are also part of a more extensive roadmap for improving the quality and consistency of the Group's ESG disclosures, with a strong focus on assessing the interdependence of Metinvest's operations and environmental and social factors, and the associated risks and opportunities.

For more details regarding the identification of material topics, please refer to page 5.

SUSTAINABILITY REPORT

ENVIRONMENT AND SOCIAL MANAGEMENT SYSTEM

Metinvest's approach to the governance of sustainability-related areas is rooted in accountability, transparency and adherence to international best practices.

Community engagement, human capital management, occupational health and safety, and environmental stewardship are governed by policies and multilayered oversight. These elements are monitored by the Supervisory Board through relevant committees and the Management Board, with the involvement of the executive team.

This holistic approach enables the Group to fulfil its responsibilities towards stakeholders and advance sustainable development.

ENVIRONMENT AND CLIMATE	HEALTH AND SAFETY	HUMAN CAPITAL	COMMUNITIES
SUPERVISORY BOARD			
Health, Safety and Environmental Committee	Health, Safety and Environmental Committee	Appointments and Compensations Committee	Supervisory Board
MANAGEMENT BOARD			
EXECUTIVE TEAM			
Technological Directorate	Operations Directorate Coal Directorate	Sustainable Development and People Management Directorate	Operations Directorate
Internal Audit Directorate			
INTERNAL REGULATIONS AND INTERNATIONAL STANDARDS			
Policy in the Field of Health, Safety and the Environment Climate Change Policy	Policy in the Field of Health, Safety and the Environment	Human Capital Management Policy	Approaches and Principles of Social Spending and Local Community Engagement
ISO 50001, 14001:2015	ISO 45001	ILO Conventions	
GENERAL REGULATIONS			
SCM Sustainability Policy	Human Rights Policy	Code of Business Partnership	Code of Ethics
PRIORITISED SUSTAINABLE DEVELOPMENT GOALS			
8 Decent Work and Economic Growth	Industry, Innovation and Infrastructure 11 Sustainable and Comm	e Cities 12 Responsible Consumple and Production	ption 13 Climate Action

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STAKEHOLDER ENGAGEMENT

In 2024, Metinvest strove to engage in meaningful ways with all external and internal stakeholder groups.

Employees. The Group prioritised the safety and well-being of its employees, implementing comprehensive safety measures, reskilling initiatives and targeted support for those affected by the war.

Customers. Regular customer dialogue, strengthened key account management and ongoing digitalisation efforts were aimed at improving service quality and customer satisfaction.

Suppliers and contractors. Metinvest sustained stable supplier relationships by diversifying sourcing and optimising procurement strategies. There was an ongoing focus on compliance and thorough due diligence, while effective communication fostered engagement.

Local communities. The Group engaged with local communities, identifying and addressing their evolving needs. Through partnerships and targeted programmes, it focused in Ukraine on supporting the country's defenders, social infrastructure restoration, humanitarian and other projects.

Equity and debt providers. Metinvest actively engaged with its debt providers, consistently meeting its obligations. The Group progressed with its efforts to reduce debt. Concurrently, it secured new funding arrangements to support its operations.

Government authorities. The Group engaged with government authorities through conferences and participation in employer and business association working groups. Through its involvement, Metinvest contributed to legislative developments on labour relations, vocational education reform and occupational practices.

Media. Metinvest managed its public relations, coordinating media engagements and emphasising its role in supporting Ukraine's defence efforts and economic resilience.

ESG RATINGS

Independent ESG ratings play a crucial role in assessing Metinvest's performance across environmental, social and governance criteria, as well as highlighting potential areas for enhancement. During the reporting period, the Group maintained ESG ratings from three globally respected agencies: MSCI, Sustainalytics and S&P.

MSCI

ESG RATING BB

MSCI evaluates companies based on their industry-specific ESG risk exposure and their effectiveness in managing such risks compared with peers, assigning ratings on a scale from 'CCC' (lowest) to 'AAA' (highest).

In May 2025, after the reporting period, MSCI affirmed its ESG Rating for Metinvest at 'BB', underlining that the Group has detailed policies on business ethics, with strong focus on anti-corruption measures. The agency highlighted that safety management is aligned with industry standards, and executive compensation is linked to safety performance. It also stated that the Group's waste handling practices meet sector norms, and production facilities are certified under the ISO 14001 environmental standard.

SUSTAINALYTICS

ESG RISK RATING 38.3

Sustainalytics measures a company's level of unmanaged ESG risk, scoring it on a scale ranging from 0 (lowest risk) to 100 (highest risk).

Beginning in 2024, Sustainalytics stopped providing solicited ESG ratings to privately owned companies. As a result, the Group's ESG Risk Rating was terminated in May 2024. However, the coverage of Metinvest was restarted later in the year.

In December 2024, Sustainalytics assigned Metinvest the ESG Risk Rating of 39.1, an improvement from the level of 39.5 awarded earlier. The agency assessed the Group's management of ESG risks as average, mentioning that Metinvest strengthened its human resources strategy and that it recognised its robust approach to health and safety, including active risk prevention measures.

The assessment included risks beyond the Group's control associated with the full-scale war in Ukraine.

In May 2025, after the reporting period, Metinvest's ESG Risk Rating improved further to 38.3.

S&P

CSA SCORE 36 GLOBAL ESG SCORE 41

The S&P Global Corporate Sustainability
Assessment (CSA) assigns companies two
related scores: the CSA Score, which reflects
sustainability performance based on its
public disclosures, and the ESG Score, which
expands upon the CSA results by incorporating
additional factors, including modelling
approaches and media/stakeholder analysis.
Both scores apply a broad range of industryspecific sustainability criteria from 0 to 100
(100 being the maximum, the higher the
better).

In February 2025, after the reporting period, S&P's Global CSA Score for Metinvest improved to 36, compared with 32 in 2024. The Group's Global ESG Score stood at 41, up from the rating of 37 awarded earlier.

S&P cited Metinvest's improvements in climate change management and human rights practices as the primary drivers for increasing the scores in February 2025. The agency also highlighted that the Group's business ethics practices exceed the industry average and its environmental management policy, particularly in energy stewardship, surpasses common industry practices.

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UN SDG CONTRIBUTION IN 2024

Being a member of the UN Global Compact for more than 15 years, Metinvest adheres to the Ten Principles of Sustainable Development.

The Group is committed to progressing the UN SDGs, prioritising efforts where its contributions can have the greatest impact.

The ongoing full-scale war in Ukraine substantially affects Metinvest's operations and its initiatives towards achieving the SDGs. The Group remains dedicated to supporting Ukraine and its people throughout the challenges caused by the war.

Throughout these difficulties, Metinvest has maintained its focus on advancing the UN SDGs. The Group concentrates primarily on the five goals most closely aligned with its long-term strategic priorities:

- SDG 8 (Decent Work and Economic Growth)
- SDG 9 (Industry, Innovation and Infrastructure)
- SDG 11 (Sustainable Cities and Communities)
- SDG 12 (Responsible Consumption and Production)
- SDG 13 (Climate Action).

Metinvest also contributes to achievement of other UN SDGs, such as SDG 1 (No Poverty), SDG 3 (Good Health and Well-being), SDG 4 (Quality Education), SDG 5 (Gender Equality), SDG 6 (Clean Water and Sanitation), SDG 7 (Affordable and Clean Energy), SDG 10 (Reduced Inequalities), SDG 15 (Life on Land), SDG 16 (Peace, Justice and Strong Institutions), and SDG 17 (Partnerships for the Goals).

CONTRIBUTION TO PRIORITISED SDGs



- Sustain operational performance and prioritise critical repairs
- Deliver medical, psychological and other assistance to war-impacted employees and their families
- Advance comprehensive programmes for veterans' adaptation and transition back into civilian life
- Increase salaries and enhance the motivation system



- Collaborate with Ukrainian authorities and private sector partners on Ukraine's post-war rebuilding initiatives
- Diversify business activities to support the Group's shift towards green steel manufacturing practices
- Strengthen digitalisation efforts and enhance cybersecurity measures
- Broaden educational offerings through Metinvest Polytechnic



- Support defenders with protective and other equipment
- Deliver humanitarian aid to the impacted communities
- Repair damaged infrastructure
- Equip shelters to protect communities from shelling
- Support hospitals with essential repairs, equipment and medicines



- Strengthen energy safety management to ensure operational resilience and reduce production disruptions
- Use innovative and resource-efficient technological solutions
- Recycle and reuse waste and by-products from steelmaking and mining
- · Increase utilisation of recycled and reused water



- Implement energy-efficiency initiatives
- Improve the transparency and accuracy of carbon emissions reporting
- Strengthen climate-related governance and the risk management system
- Evaluate climate-related risks and opportunities using scenarios aligned with the Paris Agreement