



# Westfälische Drahtindustrie GmbH

## Sustainability Report 2023

according to the standards of the Global Reporting Initiative (GRI)



## Foreword CEO

---

Companies are required to react to changes in the world and adapt their corporate policy and business activities accordingly. In the current public perception is that the impending changes - some say crises - are particularly great right now and that the resulting demands on companies could overburden them.

At WDI, however, we believe that the careful use of natural resources and fair and cooperative dealings with employees, business partners and other stakeholders have always been necessary in order to ensure a successful and generally sustainable business. WDI has endeavoured to live up to this mission statement since our company was founded in 1856. And we believe that the more than 160-year history of the company is the visible sign that WDI has always lived up to this mission statement.

Of course, we at WDI also consider the major current challenges, such as the transformation process towards CO<sub>2</sub>-free production or the shortage of skilled labour, to be particularly important. However, WDI recognised these issues as critical at an early stage and therefore possibly took appropriate measures or developed standards earlier than other companies.

In this sustainability report, we have summarised for you the measures and working methods that WDI has taken to meet current requirements with regard to sustainable development.

However, we do not see our successes to date as a reason to rest on our laurels. We are convinced that only the constant further development of our business activities and the respective adaptation to changing requirements can guarantee sustainable development. We consider the regular publication of the sustainability report to be essential in order to inform all of WDI's stakeholders openly and transparently about our progress.

However, the work we have already done and the constant new challenges we face would not be possible without the dedicated work of our employees. With the publication of the sustainability report, the management would like to take the opportunity to express our sincere thanks for the work they have done.

Katja Pampus  
Chairwoman of the Management Board Hamm |  
April 2024



# 1. The organisation and its reporting obligations

## GRI 2-1 Organisational profile

Name of the organisation: Westfälische Drahtindustrie GmbH (here in after referred to as WDI). The head office of WDI is located at Wilhelmstraße 7, 59071 Hamm, Germany.

WDI has the legal form of a limited liability company (GmbH) and is a family-run company.

WDI has 14 operating sites in Germany (see GRI 2-6) and investments in the following companies:

- Nedri Industriedraht GmbH, Hamm, Germany (100%)
- WWH Westfälische Walzdrahthandel GmbH, Hamm, Germany (100%)
- Nedri Spanstaal BV, Venlo, Netherlands (100%)
- Uniropo Ltd, Mississauga, Canada (100%)
- WDI Trading Shanghai Ltd, Shanghai, China (100%)
- WDI Polska spzoo, Katowice, Poland (100%)

Further information on the company can be found on the website [www.wdi.de](http://www.wdi.de).

## GRI 2-2 Entities included in the organisation's sustainability reporting

Sustainability reporting is carried out exclusively for the individual company Westfälische Drahtindustrie GmbH.

## GRI 2-3 Reporting period, reporting frequency and contact point

This Sustainability Report is the first report by Westfälische Drahtindustrie GmbH and relates to the 2022/2023 financial year (1 Oct. 2022 - 30 Sep. 2023).

This report was published on 1 April 2024. In future, the report will be updated annually and published on the website [www.wdi.de](http://www.wdi.de).

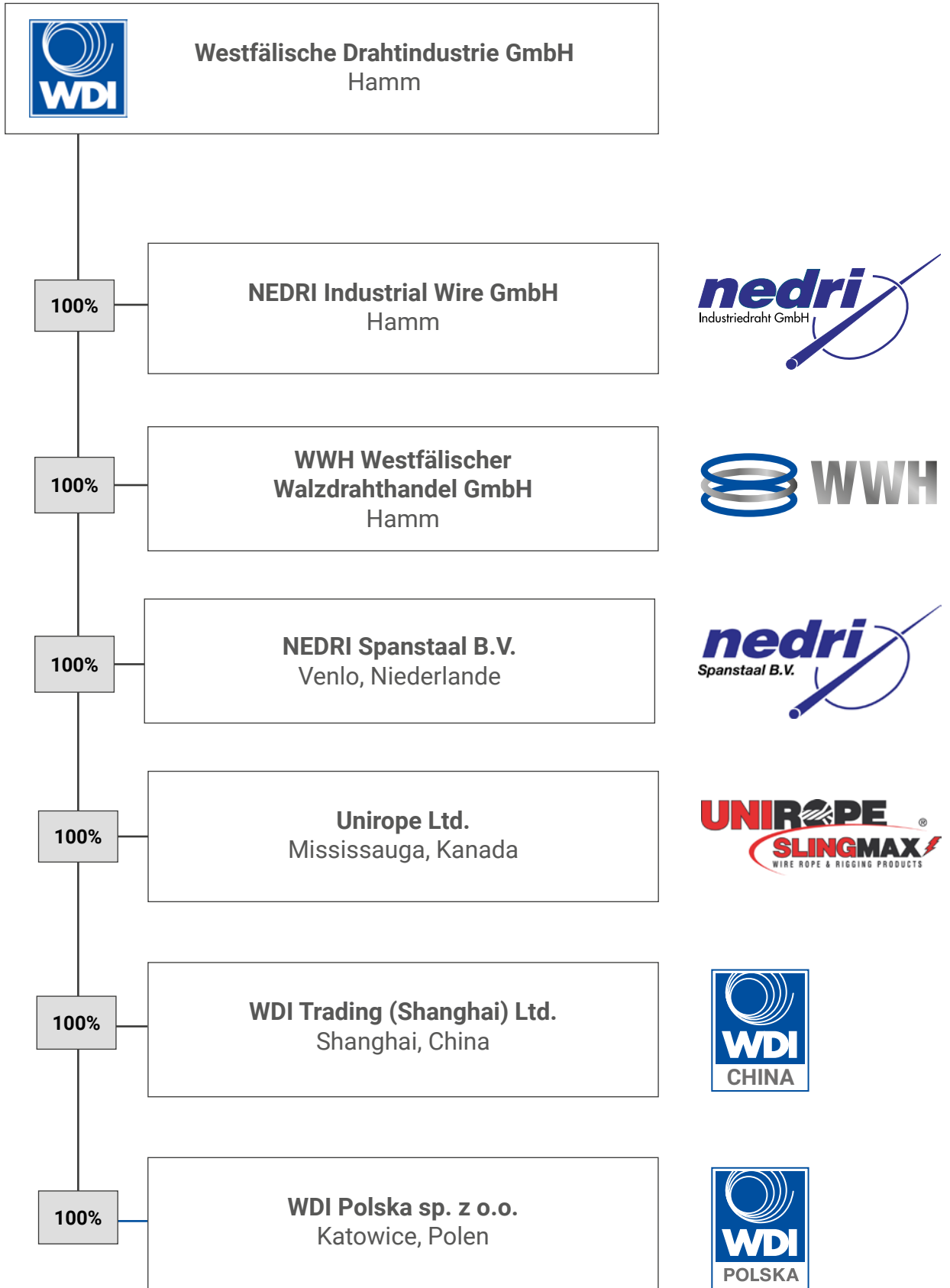
There is a contact form on the website that can be used to send all questions and comments about the report directly to the sustainability department.

## GRI 2-4 Correction or restatement of information

As the report was prepared for the first time, there is no need for any corrections or restatements.

## GRI 2-5 External audit

There is currently no external audit of the report. However, the management of WDI has satisfied itself that the data used in the report is consistent with both the data published as part of the financial reporting and with the internal data. The follow-up report for the 2023/2024 financial year is expected to be audited externally.



## 2. Activities and employees

GRI 2-6

### Activities, value chain and other business relationships

WDI is a steel processing company and primarily manufactures wire products for the processing industry. WDI is the largest independent wire producer in Europe and supplies customers worldwide.

The individual products are manufactured at different production sites, each of which is organised in the form of a profit centre (PC). There are 4 PCs at the Hamm sites and 3 PCs are located at the Rothenburg site. All other locations only have a single PC.

In detail, the following products are manufactured for the following customer industries.

Product	Major customer industry	Operating sites (PC)
Reinforced steel mesh	Construction industry	Salzgitter (PC07)
Cold heading wire	Automotive industry, Construction industry	Hamm (PC03) Kalthof (PC10)
Steel wires	Automotive industry, Mechanical engineering	Hamm (PC03) Rothenburg (PC01) Kalthof (PC10)
Iron wires	Furniture industry	Hamm (PC03) • Rothenburg (PC01) Brandenburg (PC15)
Flat wire	Construction industry	Brotterode (PC06)
Bright steel	Automotive industry, Mechanical engineering, Trade	Hamm (PC08) • Schwerte (PC09) Ixheim (PC13)
Welding wire	Automotive industry, Mechanical engineering, Wind energy, Pipeline construction	Hamm (PC04) Rothenburg (PC14)
Steel cables	Construction industry, Mining, Mobile cranes	Dortmund (PC11) • Syke (PC12) Zwickau (PC19)
Overhead cables	Energy industry	Rothenburg (PC02) Berlin (PC16)
Prestressing steel	Construction industry	Hamm (PC05)
Barbed wire	Horticulture, Forestry	Altgandersheim (PC18)

The raw material for the products is wire rod, sourced from German and European steel-works and rolling mills. The wire rod, supplied in coils, is transported and processed through cold forming to achieve thinner dimensions. Due to varying product requirements, some wires undergo additional treatments such as pickling, annealing, and galvanising. After the drawing process, some products go through further processing steps, such as manufacturing steel and overhead line cables.

The plant in Altgandersheim (PC 18) also purchases fences and gates from external suppliers and sells them to German or European customers.

## GRI 2-7

**Employees**

At the end of the 2022/23 reporting year (30 September 2023), WDI had 1,272 employees. The breakdown of employees is shown in the following table:

<b>Female</b>	<b>Male</b>	<b>Other*</b>	<b>Not disclosed</b>	<b>Total</b>
Number of employees (number of employees)				
<b>127</b>	<b>1.145</b>	<b>0</b>	<b>0</b>	<b>1.272</b>
Number of permanent employees (number of employees)				
<b>117</b>	<b>1.072</b>	<b>0</b>	<b>0</b>	<b>1.189</b>
Number of temporary employees (number of employees)				
<b>10</b>	<b>73</b>	<b>0</b>	<b>0</b>	<b>83</b>
Number of employees with non-guaranteed working hours (number of employees)				
<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
Number of full-time employees (number of employees)				
<b>84</b>	<b>1.112</b>	<b>0</b>	<b>0</b>	<b>1.197</b>
Number of part-time employees (number of employees)				
<b>43</b>	<b>32</b>	<b>0</b>	<b>0</b>	<b>75</b>

\* Gender, as indicated by the employees themselves

All employees work at the individual production sites in Germany.

## GRI 2-8

**Employees who are not salaried employees**

At the end of the reporting year 2022/23 (30/09/2023), 36 employees (full-time equivalent) were employed as temporary workers. These employees are mainly deployed in production.

### 3. Corporate management

---

#### GRI 2-9 Management structure and composition

The Supervisory Board monitors the Management Board at regular intervals. During the Supervisory Board meetings, the Management Board informs the Supervisory Board about the current developments and plans for future development.

The Supervisory Board is also responsible for monitoring the management of the company's impact on the economy, the environment and people.

The term of office of each member of the Supervisory Board is 4 years.

#### GRI 2-10 Nomination and selection of the highest supervisory body

The Supervisory Board consists of three members. Two members are appointed by the respective shareholders. The third member is appointed by an employee representative on the Supervisory Board. All members of the Supervisory Board have extensive knowledge and experience due to their many years of work in the steel sector.

#### GRI 2-11 Chairman of the highest supervisory body

The Chairman of the Supervisory Board is elected by the members of the Supervisory Board. Like the other members of the Supervisory Board, the Chairman is not a manager in the company.

#### GRI 2-12 Role of the highest supervisory body in overseeing the management of impacts

In addition to the statutory requirements, the company's articles of association and the rules of procedure for the Management Board provide the framework for the Supervisory Board's supervisory activities. At the end of the financial year, the Supervisory Board approves the company's annual financial statements and discharges the Management Board accordingly.

In order to be able to fulfil its control function, the Supervisory Board is involved in the The members of the Supervisory Board are provided with comprehensive information on all matters relating to the respective reporting period at regular Supervisory Board meetings. The Supervisory Board receives the relevant information in advance of the meetings so that the members of the Supervisory Board can inform themselves accordingly. be able to prepare such information. If information is required outside of the normal Supervisory Board meetings, the Supervisory Board has the opportunity to request this information from the Management Board at any time.

The Supervisory Board also monitors the Management Board to ensure that the values and guiding principles of the company, as well as the strategy, policy and objectives of the company in are in line with the ideas of the various stakeholders.

#### GRI 2-13 Delegation of responsibility for managing the impact

The Supervisory Board monitors the Management Board, which bears operational responsibility for the company. In addition to the economic and operational aspects of the The monitoring of the company also includes the management of the company's impact on the economy, the environment and people.



## **GRI 2-14 Role of the highest governance body in sustainability reporting Reimbursement**

The sustainability report is submitted to the Supervisory Board for information sent to the Supervisory Board. As this sustainability report was prepared voluntarily, it does not currently require review and approval by the Supervisory Board.

## **GRI 2-15 Conflicts of interest**

Conflicts of interest can, of course, arise at any time if the responsible persons have different business interests. However, due to the framework given to the company, which is specified both in the articles of association and in the rules of procedure for the management, the potential for conflicts of interest is very limited.

## **GRI 2-16 Transmission of critical concerns**

Critical concerns are communicated to the Supervisory Board by the Management Board in written or verbal form.

No critical concerns were submitted in the reporting year.

## **GRI 2-17 Collected knowledge of the highest supervisory body**

Topics relating to resource efficiency, e.g. energy consumption, are discussed during regular management briefings. The submission of the sustainability report will result in much more comprehensive reporting on sustainable development in the future.

## **GRI 2-18 Evaluation of the performance of the highest governance body**

The assessment of the performance of the highest governance body is based on compliance with legal requirements.

## **GRI 2-19 Compensation policy**

The remuneration for the Supervisory Board members is fixed and essentially represents a reimbursement of costs. In the 2022/23 financial year, a total of EUR 23 thousand was paid to the three members of the Supervisory Board.

## **GRI 2-20 Procedure for determining the remuneration**

The remuneration of the Supervisory Board members was determined by the shareholders and can be adjusted regularly. Variable remuneration components are not intended.

## 4.Strategy, policies and practices

### GRI 2-22 Declaration of application of the sustainable development strategy

WDI has had a sustainability policy in place for several years, which is revised annually. The last revision took place in January 2024. The sustainability declaration („Sustainability - an integral part of WDI’s corporate policy“) is available at any time on the website: [www.wdi.de](http://www.wdi.de)

The sustainability declaration prioritises environmental protection, waste prevention and energy efficiency. Through the resource-conserving use of chemical products, as well as a permanent reduction in the use of fossil fuels, the company aims to minimise its environmental impact. Energy or its replacement by renewable energy, the short-, medium- and long-term impact of production on the economy, the environment and people will be steadily reduced.

With regard to the specific implementation of this sustainability strategy, please refer to the comments on GRI Standards 301, 302, 303, 305 and 306 in this report.

Based on the experience gained and strategic considerations in recent years, the Management Board set the date for CO2 neutrality for the first time in November 2023. The company plans to make its entire production (Scope 1-3) climate-neutral by 2045. The corresponding „Guideline on reduction targets for climate-damaging greenhouse gases (GHG)“ is available at any time on the website [www.wdi.de](http://www.wdi.de)

### GRI 2-23 Declaration of commitment to principles and behaviour

The principles and guidelines for responsible corporate behaviour are  
The management of WDI has published the „Code of Conduct and Ethics for Business Partners of Westfälische Drahtindustrie GmbH“ as a guideline for responsible behaviour. This guideline is revised annually and can also be accessed at any time on the company website [www.wdi.de](http://www.wdi.de)

The Code of Conduct and Ethics must be observed by all of WDI’s business partners and therefore applies to employees, suppliers, customers and other stakeholders. It makes the corporate values clear and should help to ensure that the company’s expectations with regard to compliance with the law and ethical behaviour are met.

### GRI 2-24 Inclusion of the declarations of commitment to principles and behaviour

All of the company’s employees receive annual training on the sustainability declaration and the Code of Conduct and Ethics. The training is carried out by the respective supervisor and is reviewed by the HR department.

From 2025, the GHG reduction directive will also be included in the scope of training. In addition, all suppliers are obliged to agree to the guidelines specified by us on the basis of purchasing specifications.

All of the company’s investment projects are also based on the requirement to obtain the most energy-efficient system configuration.

By introducing an electronic legal register, all responsible employees of the company are informed about the laws and regulations applicable to their area.

By consistently working through the requirements derived from the laws and regulations The fulfilment of these legal obligations enables the management of WDI to check the legal conformity of WDI in a central IT tool.

#### **GRI 2-25 Procedure for eliminating negative effects**

WDI has set up a whistleblower hotline on its website [www.wdi.de](http://www.wdi.de), giving all stakeholders the opportunity to report misconduct by the company or its employees. This report can be made anonymously or optionally with Mentioning the name. A hotline has also been set up to report violations of the Supply Chain Due Diligence Act.

The two hotlines were activated at the end of 2023. No reports of misconduct had been received by 30/03/2024

#### **GRI 2-26 Procedure for seeking advice and reporting concerns**

In addition to the complaints procedures via the hotlines described in GRI 2-15, all employees can all employees can seek advice via the store stewards of the works councils and report any misconduct by superiors. In addition, there is regular contact between employees and management during the regular site visits, which create opportunities to address problems at management level. Works meetings are held regularly with the participation of the management, so that employees can also address undesirable developments directly or anonymously via the works councils.

#### **GRI 2-27 Compliance with laws and regulations**

There were no significant violations of laws and regulations in the reporting period.

## **GRI 2-28 Membership of associations and interest groups**

The company is a member of the following organisations:

- Iron Wire and Steel Wire Association (ESV)
- Welding Electrode Association (SEV)
- Unternehmensverband Westfalen-Mitte e.V.
- Association of German Women Entrepreneurs
- Association of the German Spring Industry (VDFI)
- Federal Association of Small and Medium-Sized Enterprises
- Fachverband Metallzauntechnik e.V.
- Fachverband Drahtzaun e.V.
- Institute for Reinforced Concrete Reinforcement e.V. (ISB)
- EWRIS

In order to further reduce the possibility of anti-competitive agreements, the management of WDI decided at the end of 2023 to discontinue or phase out any cooperation in the commercial committees of the above-mentioned associations. However, participation in the technical committees is still considered necessary.

## **5. Stakeholder involvement**

---

### **GRI 2-29 Approach to stakeholder involvement**

As a globally active company, WDI recognises that it shares responsibility for solving the environmental and social challenges that arise from our economic activities. WDI strives for close cooperation with all social groups. To this end, those responsible at WDI are in regular contact with employees, authorities, customers, suppliers and other stakeholders in order to identify at an early stage whether existing specifications or internal guidelines need to be adapted or improved.

### **GRI 2-30 Collective labour agreements**

Collective agreements apply to all employees of WDI, with the exception of the members of WDI's management.

## **6. Key topics**

---

### **GRI 3-1 Procedure for determining material topics**

The company is in constant dialogue with the various stakeholders as part of its normal business activities. The following material topics have emerged from this dialogue:  
See next page

The respective order of the topics does not represent a prioritisation.

Stakeholder	Topics 2023	Dialogue and Communication formats
Employees	<ul style="list-style-type: none"> <li>• Inflation, increased energy prices</li> <li>• Healthcare and sickness rate</li> <li>• Occupational safety</li> <li>• Education and training, training courses</li> <li>• Shortage of skilled labour</li> <li>• Home office</li> </ul>	<ul style="list-style-type: none"> <li>• WorksCouncil</li> <li>• Worksmeetings</li> <li>• Personaldiscussions</li> </ul>
Business customers	<ul style="list-style-type: none"> <li>• Production reliability and quality</li> <li>• Sustainability in the supply chain</li> <li>• Green steel</li> </ul>	<ul style="list-style-type: none"> <li>• Customer meetings and visits</li> </ul>
Suppliers	<ul style="list-style-type: none"> <li>• Production volume</li> <li>• Green steel</li> <li>• Trustful cooperation</li> </ul>	<ul style="list-style-type: none"> <li>• Supplier meetings and visits</li> </ul>
Shareholder	<ul style="list-style-type: none"> <li>• Production volume or capacity utilisation</li> <li>• Profitability</li> <li>• Acting in compliance with the law</li> </ul>	<ul style="list-style-type: none"> <li>• Shareholders' meeting</li> <li>• Supervisory Board meeting</li> </ul>
Legislator	<ul style="list-style-type: none"> <li>• New regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Association activities</li> </ul>

## GRI 3-2

### List of key topics

The regular dialogue with our stakeholders on the one hand and the internal risk analysis on the other were combined by the Management Board into a comprehensive materiality analysis.

The materiality analysis identified the key issues of „shortage of skilled labour“, „Health protection and sickness rate“, „Green steel“ and „Sustainability in the supply chain“.

## GRI 3-3

### Management of material topics

The actual and potential negative and positive impacts of the material topics and the measures taken to avoid negative impacts are described in detail in the following GRI Standards.

#### Material topics

- Shortage of skilled labour
- Health protection and sickness rate
- Green steel
- Sustainability in the supply chain

#### GRI-Standard

- GRI 401 and GRI 402, 403-6
- GRI 403
- GRI 2-22, GRI 201-2, GRI 308
- GRI 308 and GRI 414

In the respective areas, the company works closely with the relevant stakeholders in order to reduce or completely avoid potential negative effects on the economy, the environment and people.

## 7. Economic standards

### GRI 201 Economic performance

#### 201-1 Directly generated and economic value

WDI regularly publishes its annual financial statements at [www.bundesanzeiger.de](http://www.bundesanzeiger.de). The direct generated and economic value of the company can be taken from these publications.

#### 201-2 Financial implications of climate change for the organisation and other risks and opportunities associated with climate change

The risks and opportunities associated with climate change for the WDI correspond to the consequences that exist for the steel-producing industry due to the transformation process, as the WDI is directly dependent on the steel and rolling mills in the supply chain, and the necessary adaptation or change in the steel production process from the blast furnace process to the electric arc furnace process will have an impact on the production costs and quality of the wire rod. However, these consequences are not currently foreseeable.

#### 201-4 Financial support from the public sector

The company did not receive any support from the public sector in the reporting year.

The company can potentially receive subsidies for certain investment projects that aim to reduce energy consumption or CO<sub>2</sub> emissions.

No funding was received in the reporting year.

### GRI 202 Market presence

#### 202-1 Ratio of the standard starting salary broken down by gender to the local statutory minimum wage

The company's employees (wage and salary earners) receive remuneration above the statutory minimum wage.

#### 202-2 Proportion of senior management recruited from the local community

The proportion of senior managers (managing directors and PC managers) from Germany is 100%.

### GRI 204 Procurement practices

#### 204-1 Share of expenditure for local suppliers

The proportion of expenditure on local (German) suppliers totalled 73% in the reporting year.

## **GRI 205**   **Anti-corruption**

### **205-1**   **Operating sites that have been checked for corruption risks**

All WDI operating sites are regularly checked for corruption risks by the management as part of a risk assessment.

No corruption risks were recognised.

### **205-2**   **Communication and training on anti-corruption policies and procedures**

100% of all WDI employees receive annual anti-corruption training.

## **GRI 206**   **Anti-competitive behaviour**

### **206-1**   **Legal proceedings due to anti-competitive behaviour, cartel and monopoly formation**

In the reporting year, there were no legal proceedings initiated under national or international law with the primary aim of preventing anti-competitive behaviour.

## **GRI 207**   **Taxes**

### **207-1**   **Tax concept**

The company complies with all tax laws in Germany and abroad.  
There is no separate tax strategy.

### **207-2**   **Tax governance, control and risk management**

The management is responsible for compliance with tax laws.

### **207-3**   **Stakeholder involvement and management of tax concerns**

The company is regularly audited by the tax authorities. The audit by the tax authorities did not reveal any discrepancies with the tax documents submitted.

## 8. Ecological standards

GRI 301

### Materials

301-1

#### Materials used by weight or volume

The following renewable materials were used as raw materials in the reporting year:

Material type	tonnes	Material type	tonnes
Wire rod (steel)	492.000	Aluminium	7.000
Stainless steel	4.000	Zinc	900
Blasting media	900	Copper	350
Lead	90	Zinc-aluminium alloys	70

The following non-renewable materials were used as auxiliary and operating materials in the reporting year:

Material type	tonnes	Material type	tonnes
Hydrochloric acid	4.800	Drawing agent	500
Sulphuric acid	300	Greases + Oil	220

Both renewable and non-renewable materials are purchased from external suppliers. The values listed are directly recorded quantities.

Packaging materials are not recorded separately as these quantities are insignificant. As a rule, wire products are sold on reusable racks or drums that are returned by the customer as part of a reusable system and are therefore used several times.

301-2

#### Recycled raw materials used

The wire rod used is partly produced by melting scrap; the proportion of scrap used varies considerably and depends on the quality of the wire rod and the steel or rolling mill supplying it. According to company estimates, the proportion of scrap in the wire rod is around 25%.

The other raw materials, as well as the auxiliary and operating materials, such as hydrochloric acid, are also partly made from recycled material.

However, this recycling share cannot be estimated and is therefore recognised by the company at 0% as a precautionary measure. The above estimates indicate that 116,000 tonnes, i.e. approx. 23% of the raw materials used, have been recycled.



301-3

**Recycled products and their packaging materials**

As steel products are complete and recyclable materials, the recycling rate of the products supplied by WDI is very high at approx. 95% (estimate).

Incoming material is often delivered on wooden pallets that are not recyclable for our company. These pallets are disposed of by certified waste disposal companies. Other packaging materials are also collected centrally on the respective factory premises and disposed of by waste disposal companies.

GRI 302

**Energy**

302-1

**Energy consumption within the organisation**

The company's energy consumption is broken down as follows:

Energy source	KWh	Megajoule
Electricity	88.111.000	317.198.000
Natural gas	86.924.000	312.928.000
Diesel	3.722.000	13.401.000
Heating oil	2.692.000	9.692.000
District heating	75.000	270.000
<b>Total energy consumption within the organisation</b>	<b>181.524.000</b>	<b>653.489.000</b>

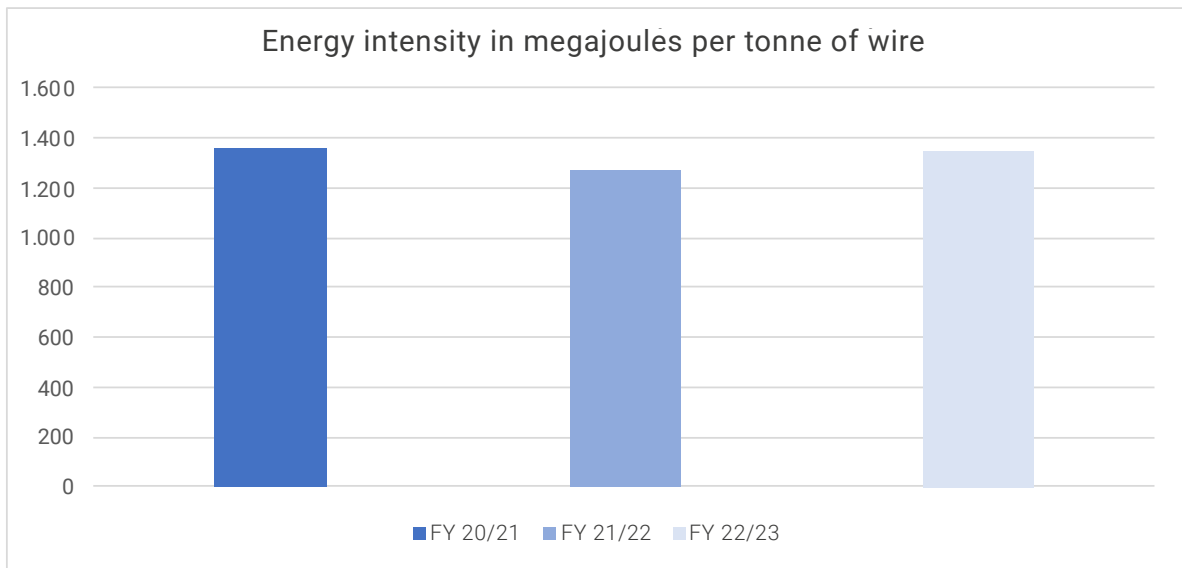
The company did not consume any self-generated electricity in the reporting year. Nevertheless, a significant proportion of total electricity production in Germany is now generated renewable. According to WDI's electricity supplier, the share of renewable electricity in the total amount of electricity purchased by WDI is 45%.

This results in a quantity of renewable electricity of 39,650,000 KWh or 142,739,000 megajoules.

### Energy intensity

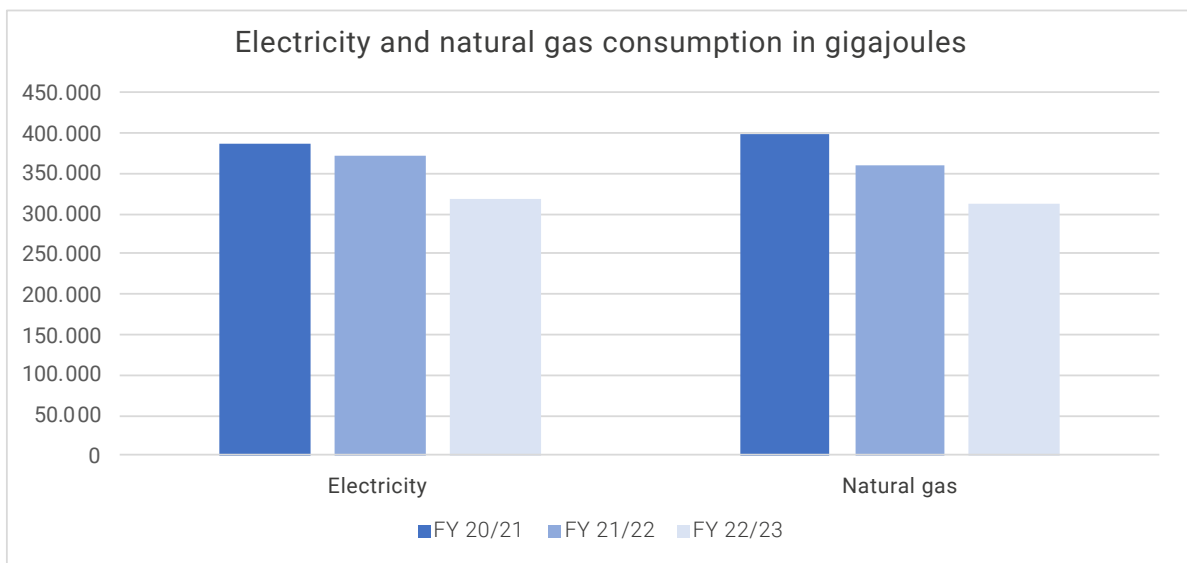
The energy intensity of the WDI is calculated using an energy intensity ratio, which sets the total energy consumption in relation to the tonnage produced. It should be noted that the energy intensity ratio may be strongly influenced by changes in production tonnage, as consumption that is independent of production volume, such as lighting or heating, is divided between the increased or decreased tonnage. The change in the production mix also has a considerable influence on the Energy intensity ratios.

The energy intensity ratio has developed over the last three financial years as shown in the following chart:



### Reduction in energy consumption

WDI's energy consumption has developed in absolute terms over the last three financial years as shown in the following chart:

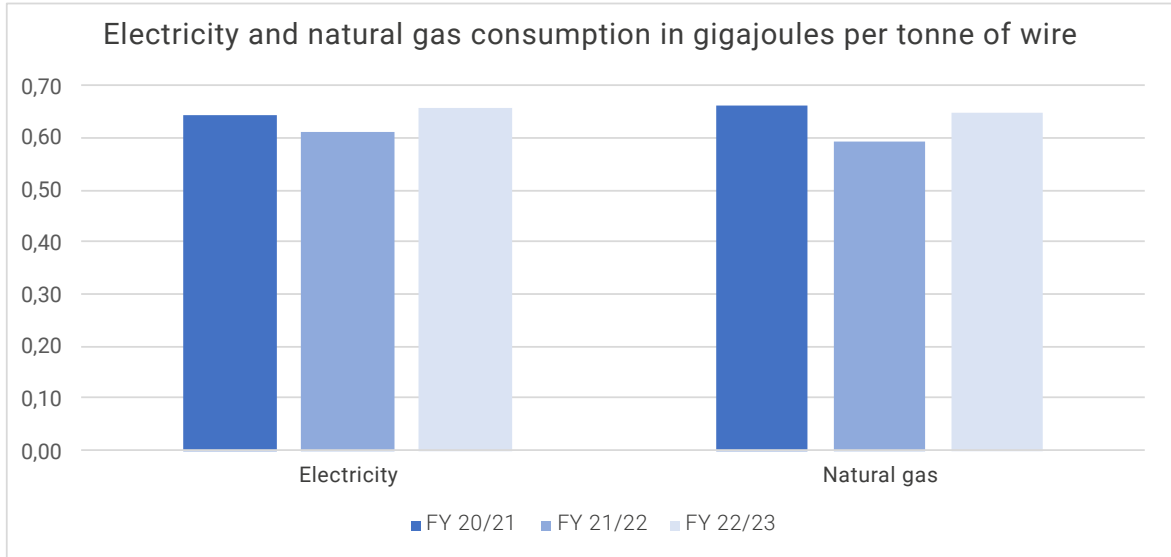


The reasons for the reduction in consumption are, on the one hand, the lower production volume and, on the other, the energy-saving projects that have been implemented.

302-5

### Reduction in energy requirements for products and services

WDI's energy consumption per tonne of wire produced has developed over the last three financial years as shown in the following chart:



The reason for the increase in electricity and energy consumption per tonne of wire compared to the previous year is mainly due to non-production-related consumption, such as for lighting and heating, which is spread over a lower production tonnage.

GRI 303

### Water and waste water

303-1

#### Water as a shared resource

WDI uses water exclusively as cooling water in the production process and, to a much lesser extent, as sanitary water in the shower and social rooms for employees.

As part of the utilisation of cooling water, depending on the location, the water from the municipal tap water network or, to a lesser extent, directly from a watercourse. After the water has been utilised, it is either returned to the municipal wastewater network as process water or purified and discharged into the watercourse.

303-2

#### Dealing with the effects of water recirculation

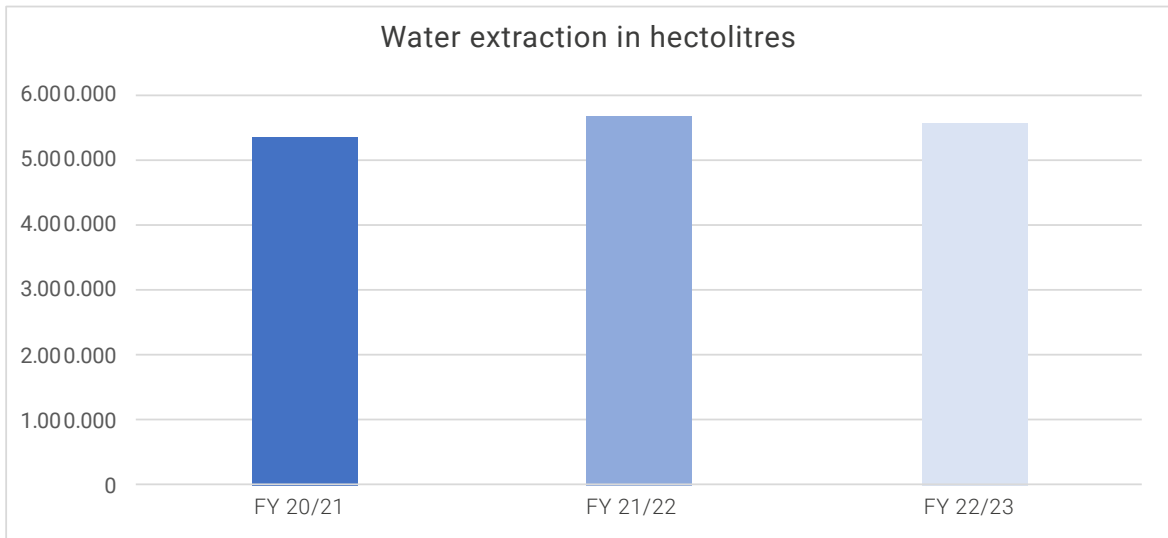
In Germany, wastewater discharges into the municipal water network are subject to a strict legal monitoring. Detailed specifications are laid down with regard to any pollutant load, which ensure that discharges of process water cannot lead to any negative effects on the environment or people.

At one WDI site, process water is discharged into a watercourse. WDI has obtained a special water discharge licence for this from the local authorities. There are also strict legal requirements with regard to water quality. Before being discharged into the watercourse, the process water is purified and any pollutants are filtered out. Continuous monitoring is carried out by the local authorities.

303-3

### Water withdrawal

WDI's water withdrawal has developed in absolute consumption figures over the last three financial years as shown in the following chart:



WDI does not produce in areas with water stress.

303-4

### Water recirculation

The amount of water recirculation essentially corresponds to the water withdrawal. The effects of water evaporation during the production process are negligible.

303-5

### Water consumption

There is no water consumption in WDI's production process. Water is mainly used for cooling purposes, meaning that the water withdrawn is essentially the same as the water returned.

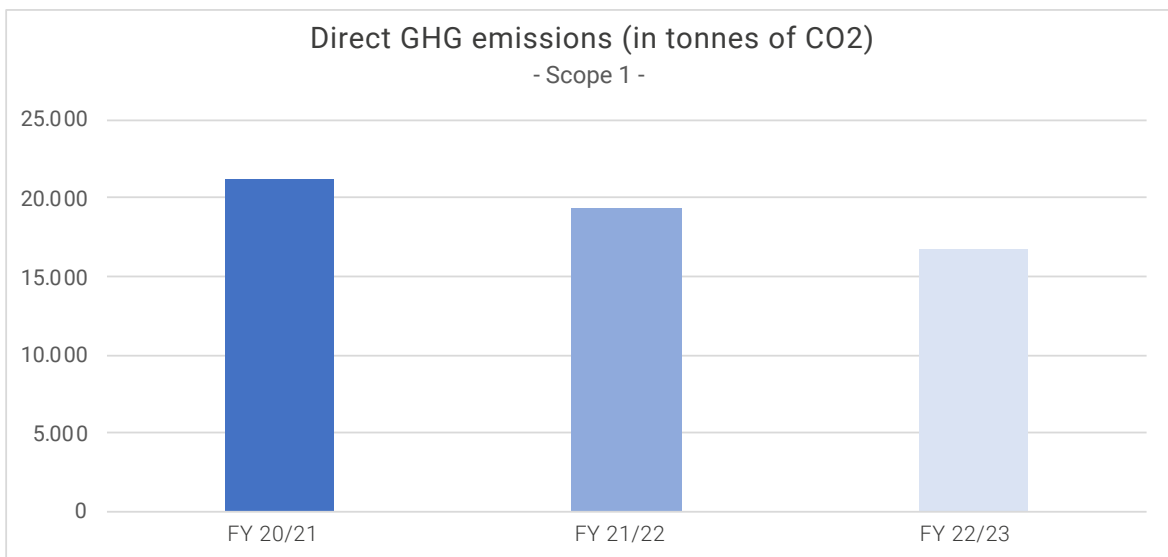
GRI 305

## Emissions

305-1

### Direct GHG emissions (Scope 1)

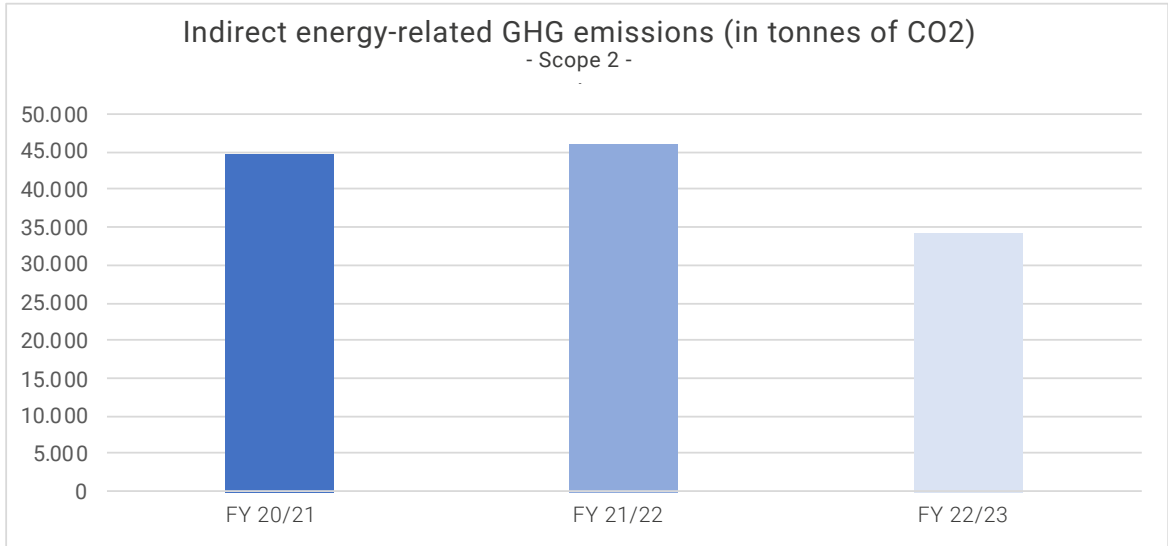
The company's energy consumption is broken down as follows: WDI's direct emissions (Scope 1) have developed over the last three financial years as shown in the following chart:



305-2

### Indirect energy-related GHG emissions (Scope 2)

WDI's indirect energy-related emissions (Scope 2) have developed over the last three financial years as shown in the following chart:

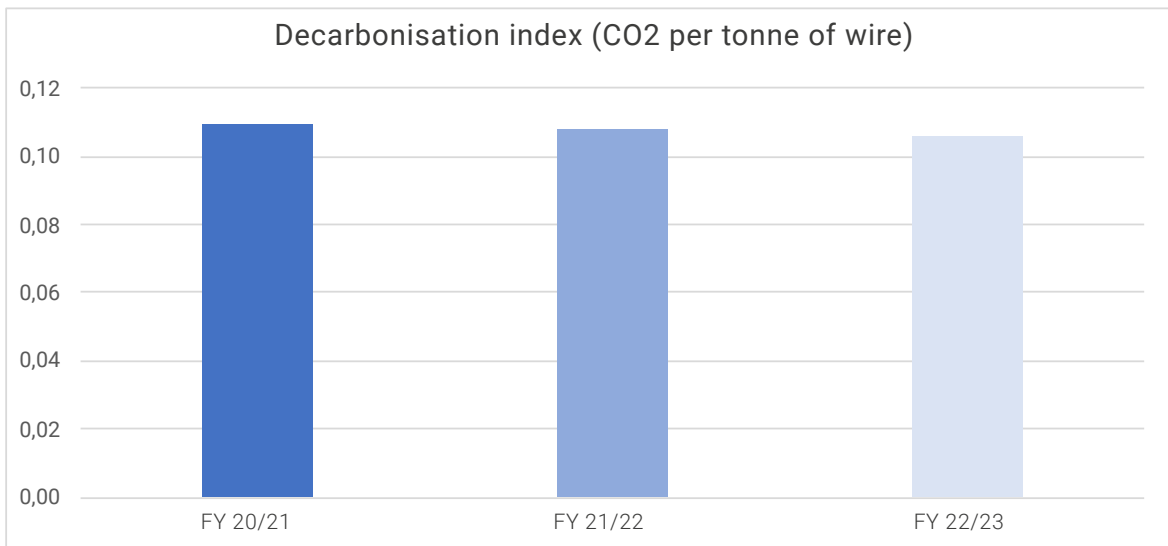


305-4

### Intensity of greenhouse gas emissions

To calculate the intensity of greenhouse gas emissions, the WDI has introduced a decarbonisation index that represents the emissions per tonne of wire produced.

The following chart shows the development of the decarbonisation index over the last three financial years:



### 305-5 Reduction of greenhouse gas emissions

In the reporting year, the following projects were implemented that led to a direct reduction in emissions:

Projects	CO2 reduction (in tonnes)
Hall wall central plant, Hamm	231
Lighting PC01	66
Lighting PC03 and PC04	22

For reasons of clarity, the table only contains the three projects with the largest volume of savings. Further energy-saving projects have been implemented.

## GRI 306 Waste

### 306-1 Waste generated and significant waste-related impacts

As a rule, no waste is produced during wire production, as most of the raw materials are recycled and packaging materials are of no significant importance. Only during the pickling process are certain chemical products used, which later have to be disposed of as waste.

During the pickling process, 4,800 tonnes of hydrochloric acid and 300 tonnes of sulphuric acid were produced in the reporting year.

### 306-2 Management of significant waste-related impacts

Waste is stored at WDI in accordance with official requirements and disposed of exclusively by certified disposal companies. This procedure ensures that the impact on the environment and people is not significant.

### 306-3 Accumulated waste

The following table contains the quantities of waste generated at WDI

Type of waste / product	tonnes
Hydrochloric acid	4.800
Sulphuric acid	300

## GRI 308 Environmental assessment of suppliers

### 308-1 New suppliers that have been screened using environmental criteria

Suppliers are regularly asked about their compliance with ESG criteria as part of the German Supply Chain Duty of Care Act.

### 308-2 Negative environmental impacts in the supply chain and measures taken

No suppliers with significant actual and potential negative environmental impacts were identified during the reporting period.

## 9. Social standards

### GRI 401 Employment

#### 401-1 Newly hired employees and employee turnover

In the reporting year, the company had 150 employees (wage and salary earners). at the same time, 153 employees (wage and salary earners) have left the company. left the company. The company does not currently have a breakdown of those joining and leaving the company by age group and gender.

The relatively high number of new hires and departures reflects the current very high level of mobility on the labour market. The shortage of skilled labour in the economy as a whole, which is mainly the result of demographic change, means that more and more employees retire or are poached by other companies at better conditions.

The company sees the continuous improvement of social standards at WDI as an important building block in minimising the effects of demographic change and retaining or attracting skilled workers for the company.

#### 401-2 Company benefits that are only offered to full-time employees, but not to employees with fixed-term contracts or part-time employees

All basic benefits offered by the company to full-time employees (wage and salary earners) are also available to salaried employees (wage and salary earners). The programme is available to employees with fixed-term contracts or part-time employees.

#### 401-3 Parental leave

Reconciling work and family life can be a major challenge for employees. In order to support young families in this, the legal regulations in Germany and are expressly endorsed by the company.

The promotion of parental leave and the associated promotion of work-life balance plays a part in making the company attractive to existing employees and future applicants. Strengthening this social component also helps to mitigate the effects of the shortage of skilled labour.

The following table shows the utilisation of parental leave by employees in the company:

	Female	Male	Other*
Total number of employees who have taken parental leave	5	15	0
Total number of employees who returned to work after parental leave ended within the reporting period	1	12	0
Total number of employees who returned to work after parental leave ended and were still employed twelve months after their return	1	10	0
Return rate of employees who have taken parental leave	20 %	80 %	0%
Retention rate of employees who have taken parental leave	20 %	67 %	0%

\*Gender, as self-identified by the employees

## **GRI 402 Employer- employee relationship**

### **402-1 Minimum notification period for operational changes**

In Germany, relations between employees and employers are regulated in detail by law. Under the Works Constitution Act and other laws and regulations, the works council is granted comprehensive information and co-determination rights. Timely involvement of the works council and thus the employees in significant operational changes is therefore mandatory.

## **GRI 403 Health and safety at work**

### **403-1 Management system for health and safety at work**

The basis for working in the company is the guiding principle „Safety before production.“ This makes it clear that the safety of our employees and protection against hazards is the top priority at WDI.

In Germany, there are extensive occupational health and safety laws that require companies to implement a health and safety management system that applies to all employees of the company, as well as to employees of other companies who are on the WDI premises on behalf of WDI.

Each location has a safety specialist. At the two large locations in Hamm and Rothenburg, this safety specialist is an employee of the company. At smaller locations, WDI has commissioned external companies to handle these tasks.

The health and safety management system includes risk assessments for machinery and production processes, compliance with legal requirements, internal regulations, guidelines, and the monitoring of regular employee training on health and safety topics.

Occupational health and safety topics are regularly part of employee meetings, enabling direct exchange between employees and employers, and ensuring that relevant information on health and safety is communicated accordingly.

### **403-2 Hazard identification, risk assessment and incident investigation**

The company has a risk assessment for each facility and production process that identifies potential hazards. These risk assessments are available at the workplace and can be accessed by every employee. Annual training sessions ensure that employees are aware of these risk assessments.

If hazardous substances are used in the production process, a data sheet is available for each of these substances, along with appropriate labeling. Employees also receive annual training on this topic.

As part of occupational safety committee meetings (ASA meetings), the status of occupational safety is regularly reviewed and critically evaluated. Participants in the ASA meetings include representatives of employees, employers, and, in part, the company doctor. The goal of the ASA meetings is to identify and eliminate potential hazards before an accident occurs. Regular inspections of the facility are also part of the ASA meetings.



In the event of a work accident, the course of the accident is traced, and measures to prevent further accidents are agreed upon. Representatives of both employees and employers, as well as, if possible, the injured employee, participate in the accident investigation. Every accident resulting in at least a 3-day work absence is reported to the trade association, and corrective measures are developed.

#### 403-3 Occupational health services

The employees at each site are regularly monitored by a company doctor. Due to the small size of the company's sites, external sub company to provide the company doctor.

The company doctor is subject to medical confidentiality so that it is ensured that personal data is not passed on to the employer.

#### 403-6 Promoting the health of employees

Statutory health insurance in Germany guarantees general and comprehensive healthcare for all citizens. In addition to the statutory regulations

WDI promotes preventive healthcare for its employees with the following programmes:

- **Health bonus:** The company has taken out insurance in favour of its employees. The company has taken out a health insurance programme for its employees that allows each employee to be reimbursed EUR 300 per year for privately paid healthcare costs. This enables costs e.g. for spectacles, hearing aids, dental cleaning and prostheses, massages, medication etc. are reimbursed.
- **Job bike:** Every employee has the opportunity to lease two bicycles from the company. Thanks to subsidies from the company and a better This means that bicycles can be purchased more cheaply in line with tax treatment. The more regular use of bicycles is intended to promote the health development of employees.
- The Hamm site organises a weekly „back training course“, which is free of charge for all employees.
- Employees who spend the majority of their working day at a desk are entitled to an ergonomically optimised workplace, such as height-adjustable desks.

#### 403-8 Employees covered by a management system for health and safety at work

All employees of the company, but also all employees of other companies that have been commissioned by WDI and are present on the premises of WDI, are covered by the management system for health and safety at the workplace of the company.

#### 403-9 **Work-related injuries**

WDI measures occupational accidents that have led to an interruption of work and are reported to the employers' liability insurance association using the "accident frequency" indicator. The accident frequency measures the number of accidents at work per 1 million working hours and represents an internationally recognised basis of measurement for comparing companies of different types with one another.

The main occupational accidents at the WDI are sprains and contusions with a focus on injuries to the hand, arm and foot. The following table shows the frequency of accidents over the last three financial years:

	FY 20/21	FY 21/22	FY 22/23
Number of accidents at work	64	71	52
Number of hours worked	1.819.104	1.891.468	1.806.465
Accident frequency (based on 1 million working hours)	35	38	29

There were no fatal accidents at work during the reporting period. Nevertheless, there were two injuries with serious consequences for the injured employee, which resulted in a have led to a permanent impairment of the employee's health.

#### 403-10 **Work-related illnesses**

There were no work-related illnesses in the reporting year.

### GRI 404 **Training and further education**

#### 404-1 **Average number of hours for training and further education per year and employee**

The average number of hours spent on training and development per year and employee was 5.3 hours.

#### 404-2 **Programmes to improve the skills of employees and provide transitional assistance**

The average number of hours of participation in skills improvement programmes per year per employee was 1.6 hours.

#### 404-3 **Percentage of employees receiving regular performance and career development reviews**

The company does not regularly assess the performance of employees or their professional development.

### GRI 405 **Diversity and equal opportunities**

#### 405-1 **Diversity in supervisory bodies and among employees**

WDI employs staff (wage and salary earners) from around 30 nations. The company does not keep separate statistics on this.

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

WDI employees (wage and salary earners) are remunerated in accordance with the collective wage agreement (ERA), which is negotiated uniformly by IG Metall and the employers' associations for the regional collective bargaining area. The aim of the ERA collective agreement is to ensure uniform and objective remuneration for all employees, thus enabling gender-neutral remuneration.

**GRI 406 Non-discrimination**

406-1 **Incidents of discrimination and remedial action taken**

There were no incidents of discrimination during the reporting period. Employees (wage and salary earners) have the opportunity to report cases of discrimination to the works council or to the company's hotline.

**GRI 407 Freedom of association and collective bargaining**

407-1 **Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk**

The extensive laws and regulations in Germany ensure that freedom of association and collective bargaining are guaranteed.

**GRI 408 Child labour**

408-1 **Operations and suppliers at significant risk for incidents of child labour abuses**

No children are employed at the WDI sites. The provisions of the Youth Protection Act apply to trainees who have not yet reached the age of majority.

**GRI 409 Forced or compulsory labour**

409-1 **Operations and suppliers at significant risk for incidents of forced or compulsory labour**

There is no forced or compulsory labour at WDI's operating sites. The laws of the Federal Republic of Germany, which exclude such labour conditions, apply at all WDI sites.

**GRI 410 Security practices**

410-1 **Security personnel trained in human rights policies and procedures**

There are no security personnel at WDI's operating sites who could have an impact on the local population.

**GRI 411 Rights of indigenous peoples**

411-1 **Incidents in which the rights of indigenous peoples were violated**

Due to the population structure in Germany, there are no indigenous peoples whose rights could be violated by the company.

## **GRI 413 Local communities**

### **413-1 Operating sites with local community involvement, impact assessments and support programmes**

WDI's operating sites are primarily integrated into the local communities through direct economic and financial processes, such as employee remuneration, tax payments by the company to municipalities, and employment of resident companies.

Other possible integrations that might have negative impacts on the economy, environment, and people are subject to strict legal regulations in Germany. Additionally, local communities have the opportunity to report any negative impacts at any time via a complaint hotline.

No negative impacts on the local communities were reported during the reporting year.

### **413-2 Operations with significant or potential negative impacts on local communities**

The company's business activities had no negative impact on local communities in the reporting year (see notes GRI 413-1).

## **GRI 414 Social assessment of suppliers**

### **414-1 New suppliers that have been screened using social criteria**

All major new suppliers are recognised in accordance with the requirements of the German Supply Chain Act. The WDI Group's suppliers are checked against social criteria in accordance with the German Supply Chain Duties Act. Due to WDI's stable supplier situation, there were no new suppliers that generated significant sales with WDI in the reporting year.

### **414-2 Negative social impacts in the supply chain and measures taken**

Due to the requirements of the German Supply Chain Duty of Care Act, the key stakeholders in WDI's supply chain were audited. There were no indications of negative social impacts.

## **GRI 415 Political influence**

### **415-1 Party donations**

In the reporting year, the company did not make any donations to political parties in the form of financial contributions or donations in kind.

## **GRI 416 Customer health and safety**

### **416-1 Assessment of the impact of different product and service categories on health and safety**

Regular quality control of our products as well as comprehensive incoming and outgoing inspections ensure a consistently high level of quality for our products, so that any negative impact of our products on the health and safety of our customers is considered to be minimal.

416-2 **Infringements relating to the health and safety impacts of products and services**  
No violations were identified during the reporting period.

**GRI 417 Marketing and labelling**

417-1 **Requirements for product and service information and labelling**  
The requirements for product information vary from customer to customer due to customer-specific requirements. The company is able to fulfil 100% of all customer requirements with regard to product information.

417-2 **Infringements in connection with product and service information and labelling**  
No violations were identified during the reporting period.

417-3 **Offences in connection with marketing and communication**  
No violations were identified during the reporting period.

**GRI 418 Protection of customer data**

418-1 **Substantiated complaints regarding breaches of customer data protection and loss of customer data**  
No complaints regarding breaches of customer data protection and the loss of customer data were identified during the reporting period.

## GRI Index

GRI-Standard	Specification	Page	Reason for omission
<b>GRI 2</b>	<b>General disclosures 2021 - The organization and its reporting obligations</b>		
GRI 2-1	Organisational profile	4	
GRI 2-2	Entities included in the organisation's sustainability reporting	4	
GRI 2-3	Reporting period, reporting frequency and contact point	4	
GRI 2-4	Correction or restatement of information	4	
GRI 2-5	External audit	4	
GRI 2-6	Activities, value chain and other business relationships	6	
GRI 2-7	Employees	7	
GRI 2-8	Employees who are not salaried employees	7	
GRI 2-9	Management structure and composition	8	
GRI 2-10	Nomination and selection of the highest supervisory body	8	
GRI 2-11	Chairman of the highest supervisory body	8	
GRI 2-12	Role of the highest supervisory body in overseeing the management of impacts	8	
GRI 2-13	Delegation of responsibility for managing the impact	8	
GRI 2-14	Role of the highest governance body in sustainability reporting	9	
GRI 2-15	Conflicts of interest	9	
GRI 2-16	Transmission of critical concerns	9	
GRI 2-17	Collected knowledge of the highest supervisory body	9	
GRI 2-18	Evaluation of the performance of the highest governance body	9	
GRI 2-19	Remuneration policy	9	
GRI 2-20	Procedure for determining the remuneration	9	
GRI 2-21	Ratio of total annual remuneration		Due to the data protection, no information can be provided in this regard
GRI 2-22	Declaration of application of the sustainable development strategy	10	
GRI 2-23	Declaration of commitment to principles and behaviour	10	

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
GRI 2-24	Inclusion of the declarations of commitment to principles and behaviour	10	
GRI 2-25	Procedure for eliminating negative effects	11	
GRI 2-26	Procedure for seeking advice and reporting concerns	11	
GRI 2-27	Compliance with laws and regulations	11	
GRI 2-28	Membership of associations and interest groups	12	
GRI 2-29	Approach to stakeholder involvement	12	
GRI 2-30	Collective agreements	12	
<b>GRI 3</b>	<b>Key topics in 2021</b>		
GRI 3-1	Procedure for determining material topics	12	
GRI 3-2	List of material topics	13	
GRI 3-3	Management of material topics	13	
<b>Economic standards</b>			
<b>GRI 201</b>	<b>Economic performance 2016</b>		
GRI 201-1	Directly generated and economic value	14	
GRI 201-2	Financial implications of climate change for the organisation and other risks and opportunities associated with climate change	14	
GRI 201-3	Liabilities for defined benefit pension plans and other pension plans	14	The WDI has no defined benefit pension plan
GRI 201-4	Financial support from the public sector	14	
<b>GRI 202</b>	<b>Marktpräsenz 2016</b>		
GRI 202-1	Ratio of the standard starting salary broken down by gender to the local statutory minimum wage	14	
GRI 202-2	Percentage of employees recruited from the local community senior executives	14	
<b>GRI 203</b>	<b>Indirekte ökonomische Auswirkungen 2016</b>		
GRI 203-1	Infrastructure investments and subsidised services		The company neither invests in public infrastructure nor does it provide subsidised services.

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
GRI 203-2	Significant indirect economic impact		The company neither invests in public infrastructure nor does it provide subsidised services.
<b>GRI 204 Procurement Practices 2016</b>			
GRI 204-1	Proportion of spending on local suppliers	14	
<b>GRI 205 Anti-Corruption 2016</b>			
GRI 205-1	Operations that have been screened for risks related to corruption	15	
GRI 205-2	Communication and training on anti-corruption policies and procedures	15	
<b>GRI 206 Anti-Competitive Behaviour in 2016</b>			
GRI 206-1	Legal proceedings due to anti-competitive behaviour, cartel and monopoly format	15	
<b>GRI 207 Taxes 2019</b>			
GRI 207-1	Tax concept	15	
GRI 207-2	Tax governance, control and risk management	15	
GRI 207-3	Stakeholder involvement and management of tax concerns	15	
<b>Ecological Standards</b>			
<b>GRI 301 Materials 2016</b>			
GRI 301-1	Materials used by weight or volume	16	
GRI 301-2	Recycled raw materials used	16	
GRI 301-3	Recycled products and packaging materials	17	
<b>GRI 302 Energy 2016</b>			
GRI 302-1	Energy consumption within the organisation	17	
GRI 302-2	Energy consumption outside the organisation		No data is currently available from the upstream and downstream value chain.
GRI 302-3	Energy intensity	18	
GRI 302-4	Reduction of energy consumption	18	
GRI 302-5	Reduction of energy requirements for products and services	19	



<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
<b>GRI 303 Water and Wastewater 2018</b>			
GRI 303-1	Water as a shared resource	19	
GRI 303-2	Dealing with the effects of water recirculation	19	
GRI 303-3	Water withdrawal	20	
GRI 303-4	Water recirculation	20	
GRI 303-4	Water consumption	20	
<b>GRI 304 Biodiversity 2016</b>			
GRI 304-1	Owned, leased, and managed operating sites that are located in or next to protected areas and areas with high biodiversity value located outside protected areas		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-2	Significant impacts of activities, products, and services on biodiversity		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-3	Protected or renaturalised habitats		WDI does not have operating sites that are located in areas with high biodiversity
GRI 304-4	Species on the Red List of the World Conservation Union (IUCN) and on national lists of protected species that have their habitat in areas affected by business activities		WDI does not have operating sites that are located in areas with high biodiversity
<b>GRI 305 Emissions 2016</b>			
GRI 305-1	Direct GHG emissions (Scope 1)	20	
GRI 305-2	Indirect energy-related GHG emissions (Scope 2)	21	
GRI 305-3	Other indirect GHG emissions (Scope 3)		No data is currently available from the upstream and downstream value chains
GRI 305-4	Intensity of greenhouse gas emissions	21	
GRI 305-5	Reduction of greenhouse gas emissions	22	
GRI 305-6	Emissions of ozone-depleting substances		WDI does not produce, import or export any ozone-depleting substances
GRI 305-7	Nitrogen oxides (NOx), sulphur oxides (SOx) and other significant air emissions		WDI has no such significant air emissions

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
<b>GRI 306 Waste 2020</b>			
GRI 306-1	Waste generated and significant waste-related impacts	22	
GRI 306-2	Management of significant waste-related impacts	4	
GRI 306-3	Accumulated waste	4	
GRI 306-4	Waste diverted from disposal		Not relevant for WDI, see GRI 306-1; 306-2 and 306-3
GRI 306-5	Waste forwarded for disposal		Not relevant for WDI, see GRI 306-1; 306-2 and 306-3
<b>GRI 306 Waste Water and Waste 2016</b>			
GRI 306-3	Significant leakage of harmful substances		No leakage of significant harmful substances
<b>GRI 308 Environmental Assessment of Suppliers 2016</b>			
GRI 308-1	New suppliers that have been screened using environmental criteria	22	
GRI 308-2	Negative environmental impacts in the supply chain and measures taken	22	
<b>Social Standards</b>			
<b>GRI 401 Employment 2016</b>			
GRI 401-1	Newly hired employees and employee turnover	23	
GRI 401-2	Company benefits that are only offered to full-time employees, but not to employees with fixed-term contracts or part-time employees	23	
GRI 401-3	Parental leave	23	
<b>GRI 402 Employer-Employee Relationship 2016</b>			
GRI 402-1	Minimum notification period for operational changes	24	
<b>GRI 403 Health and Safety in the Workplace 2018</b>			
GRI 403-1	Management system for health and safety at work	24	
GRI 403-2	Hazard identification, risk assessment and incident investigation	24	
GRI 403-3	Occupational health services	25	
GRI 403-4	Employee involvement, consultation, and communication on health and safety in the workplace		Explanations on this are already listed in 403-1 and 403-2

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
GRI 403-5	Employee training on health and safety in the workplace		Explanations are already listed in 403-2
GRI 403-6	Promoting the health of employees	25	
GRI 403-7	Prevention and mitigation of impacts on occupational health and safety directly related to business relationships		The general laws in Germany apply here
GRI 403-8	Employees covered by a management system for safety and health at work	25	
GRI 403-9	Work-related injuries	26	
GRI 403-10	Work-related illnesses	26	
<b>GRI 404 Education and Training 2016</b>			
GRI 404-1	Average number of hours for training and further education per year and employee	26	
GRI 404-2	Programmes to improve the skills of employees and provide transitional assistance	26	
GRI 404-3	Percentage of employees who receive a regular salary assessment of their performance and professional development	26	
<b>GRI 405 Diversity and Equal Opportunity 2016</b>			
GRI 405-1	Diversity in governance bodies and among employees	26	
GRI 405-2	Ratio of the basic salary and the remuneration of women to the basic salary and remuneration of men	27	
<b>GRI 406 Non-Discrimination 2016</b>			
GRI 406-1	Incidents of discrimination and corrective actions taken	27	
<b>GRI 407 Freedom of Association and Collective Bargaining 2016</b>			
GRI 407-1	Operations and suppliers for which the right to freedom of association and collective bargaining could be threatened	27	
<b>GRI 408 Child Labour 2016</b>			
GRI 408-1	Operations and suppliers at significant risk for incidents of child labor	27	
<b>GRI 409 Forced or Compulsory Labour 2016</b>			
GRI 409-1	Operations and suppliers with significant influence Risk of incidents of forced or compulsory labour	27	
<b>GRI 410 Safety practices 2016</b>			
GRI 410-1	Security personnel involved in human rights policies and-programmes was trained in the procedure	27	

<b>GRI-Standard</b>	<b>Specification</b>	<b>Page</b>	<b>Reason for omission</b>
<b>GRI 411 Rights of Indigenous Peoples</b>			
GRI 411-1	Incidents in which the rights of indigenous peoples were violated	27	
<b>GRI 413 Local Communities 2016</b>			
GRI 413-1	Operating sites with the involvement of the local community, impact assessments, and support programmes	28	
GRI 413-2	Operations with significant or potential negative impacts on local communities	28	
<b>GRI 414 Social Assessment of Suppliers 2016</b>			
GRI 414-1	New suppliers that were screened using social criteria	28	
GRI 414-2	Negative social impacts in the supply chain and measures taken	28	
<b>GRI 415 Political Influence in 2016</b>			
GRI 415-1	Party donations	28	
<b>GRI 416 Customer Health and Safety 2016</b>			
GRI 416-1	Assessment of the impact of different product and service categories on health and safety	28	
GRI 416-2	Infringements relating to the health and safety impacts of products and services	29	
<b>GRI 417 Marketing and Labelling 2016</b>			
GRI 417-1	Requirements for product and service information and labelling	29	
GRI 417-2	Infringements in connection with product and service information and labelling	29	
GRI 417-3	Offences in connection with marketing and communication	29	
<b>GRI 418 Protection of Customer Data 2016</b>			
GRI 418-1	Substantiated complaints regarding breaches of customer privacy and loss of customer data	29	



# Westfälische Drahtindustrie GmbH

## Sustainability Report 2023

according to the standards of the Global Reporting Initiative (GRI)