DT SWISS

# SUSTAINABILITY REPORT 2024

## DT SWISS AG

# 1

# PREAMBLE

# DEAR **PARTNERS, FRIENDS** AND **READERS**

This is the third time we are reporting on our sustainability efforts across the DT Swiss Group. As in previous years, our goal is to provide all stakeholders with a transparent overview of how we are addressing sustainability across our global operations.
Although current global challenges may suggest that sustainability has lost priority, we are convinced that integrating it into all business processes is essential for the long-term success of our company.

Recent changes in European legislation, including the Omnibus Package, have also affected DT Swiss. We began aligning our efforts with these requirements early on and will continue to do so, even though the implementation timeline has been extended. As a result, we are now focusing our reporting on the data points provided by the European Sustainability Reporting Standards (ESRS) and will no longer follow the GRI framework. For the 2024 reporting year, we have already collected several ESRS-relevant data points, although we are not yet fully aligned with the Corporate Sustainability Reporting Directive (CSRD).

This year, we have taken significant steps forward: conducting a double materiality assessment, deepening our understanding of product-level emissions, and gaining initial experience with social audits. Encouragingly, we observe that the bicycle industry is beginning to take sustainability more seriously. Many of our key customers are actively engaging with the topic.
Going forward, it will be important to recognize that many goals can only be achieved through collaboration. At DT Swiss, we are ready and willing to walk this path together — with our partners, customers, and peers.

Michael Schuetz

DT SWISS

# 2

# GENERAL DISCLOSURES

# GENERAL **DISCLOSURES**

## 2.1 BASIS FOR PREPARATION

REPORTING SCOPE AND BOUNDARIES

RISK MANAGEMENT AND INTERNAL CONTROL

OMISSION OF INFORMATION

TIME HORIZON

ESTIMATION, UNCERTAINTY, ACCURACY

RESTATEMENTS

## 2.2 STRATEGY, BUSINESS MODEL AND VALUE CHAIN

STRATEGY AND BUSINESS MODEL

SDGS

VALUE CHAIN

STAKEHOLDER INTERESTS

## 2.3 GOVERNANCE

ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

FINANCIALS AND INCENTIVE SCHEMES

## 2.4 DUE DILIGENCE

POLICY AND COMPLIANCE

ESRS 2, BP-1, BP-2

# **GENERAL BASIS FOR PREPARATION** OF THE SUSTAINABILITY STATEMENT

## REPORTING SCOPE AND BOUNDARIES

The sustainability statement is consolidated and therefore applies to the whole DT Swiss Group including the headquarters in Biel, Switzerland and the subsidiaries in Grand Junction, U.S.A.; Oelde, Germany; Taichung, Taiwan; Oborniki, Poland; Le Bar sur Loup, France; and Trickstuff GmbH, Germany. Minority interests are not taken into account.
DT Swiss confirms that the scope of the sustainability statement is aligned with its audited, consolidated financial statements, that are not available to the public.

This sustainability report is based on a Double Materiality Assessment (DMA) conducted in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS).
The assessment was carried out in line with ESRS 1, Section 3 and ESRS 2, Disclosure Requirement IRO-1, applying both impact materiality and financial materiality perspectives. It followed a structured, evidence-based methodology to identify material sustainability-related impacts, risks, and opportunities (IROs). In order to comply with the disclosure requirements of some DT Swiss stakeholders, it was decided to include some KPIs in the "Own Workforce" section that are not material, based on the DMA results.

The limits of non-financial reporting are defined internally and include activities that are subject to direct corporate control, in particular the manufacture of high-quality bicycle components.
To provide a comprehensive view that encompasses material environmental, governance, and social matters, further segments of the value chain such as material flows and supplier aspects — over which the company only has limited influence —are duly considered.

To prepare for upcoming requirements of the EU Corporate Sustainability Reporting Directive (CSRD), this report has been aligned with selected datapoints from the European Sustainability Reporting Standards (ESRS). As a result, the content and structure of the statement have changed compared to previous reports, which used the GRI standard as a reference. A full implementation, including the comprehensive collection of all relevant data points is currently not feasible. It will be carried out once the legal uncertainties have been resolved and there is clear guidance on which data points must be reported, in what format, and by which deadlines. Therefore, completeness cannot be ensured and the report has not undergone external assurance and validation.

The report is published on the 1st of December of 2025 and covers the period from January 01, 2024, to December 31, 2024. If certain information was collected within a slightly different time period, the data is annotated accordingly. Depending on the respective KPIs, information is reported both at subsidiary level and at Group level. In cases where upstream and downstream value chain information is taken into account in addition to the DT Swiss-specific sustainability statements, this is noted accordingly. All statements containing an outlook into the future are based on valid assumptions and planning. Actual results and developments may nevertheless differ.

The process of data collection was conducted by respective internal experts per subsidiary. Sustainability goals were defined by the CSR Committee and the report formulation was prepared by the sustainability project manager. Finally, the CFO approved the overall document.

In line with the financial report, DT Swiss aims to publish the sustainability report once a year.
For any questions or comments on this report, please send an email to:
**sustainability@dtswiss.com**

ESRS 2, BP-1, BP-2, GOV-5

# **GENERAL BASIS FOR PREPARATION** OF THE SUSTAINABILITY STATEMENT

### RISK MANAGEMENT AND INTERNAL CONTROL

In the context of sustainability reporting, the company has implemented basic internal control mechanisms to mitigate risks related to sustainability topics wherever possible with the existing resources and processes.
Key risks identified in the sustainability reporting process with regards to internal controls include:

- Incomplete or inaccurate data submissions
- Estimates and assumptions with varying degrees of uncertainty
- Incorrect or outdated emission factors
- Limited visibility into the upstream value chain
- Misinterpretation of data due to human factors

To address these challenges, DT Swiss applies mitigation measures such as a four-eyes principle wherever feasible. Sustainability-related data is typically collected by the relevant departments or local entities and reviewed by the CSR team. Final datasets and narrative disclosures are doublechecked internally prior to publication to ensure additional review and feedback.
In some cases, particularly where data is collected exclusively by the CSR team, full application of the four-eyes principle cannot be guaranteed. To support data quality and methodological consistency, DT Swiss cooperates with external sustainability consultants, who can be contacted on request in cases of uncertainty.
Where more significant risks are identified, the CSR Committee is informed and involved in the analysis. The committee jointly analyses possible and actual risks and determines appropriate actions and next steps.

The foundation for identifying and managing sustainability-related risks in general is the Double Materiality Assessment (DMA), which serves as the basis for prioritizing topics and allocating resources for risk mitigation.

### OMISSION OF INFORMATION

In cases where economically sensitive information, trade secrets, or intellectual property are concerned, the extent of disclosure is carefully assessed in consultation with the company's management. This assessment ensures that the reporting provides a comprehensive picture of the company, in which, in case of doubt, individual topics are omitted to prevent negative economic consequences for DT Swiss as a result of the disclosure of confidential information.

### TIME HORIZON

Throughout the report and in line with ESRS 1, § 77, short term is defined as a time horizon of up to one year, medium term as a period of one to five years and long term as more than five years.

ESRS 2, BP-2

# **GENERAL BASIS FOR PREPARATION** OF THE SUSTAINABILITY STATEMENT

### ESTIMATION, UNCERTAINTY, AND ACCURACY OF DATA AND USE OF INDIRECT SOURCES FOR DATA COLLECTION

In accordance with ESRS 2, certain sections of this sustainability report rely on estimates derived from indirect data sources. This approach was necessary due to limitations in the availability of supplier-specific data, emission factors for certain materials and services, and the inability to reflect regional differences. These limitations primarily affect disclosures related to the value chain, particularly in the calculation of Scope 3 emissions.
Where direct data was unavailable, estimates and extrapolations were applied using recognized methodologies and databases. For instance:

- Scope 3.1 (Purchased Goods and Services) emissions were calculated using emission factors from the Ecoinvent database where materials and weights are available.
- Monetary emission factors were sourced from reputable databases such as the US EPA and Exiobase.

In 2024, supplier-specific data could only be obtained in selected areas, such as energy supply at DT Swiss's own sites. Consequently, the accuracy of reported data varies, ranging from high to low, depending on the data source and estimation method used.
DT Swiss is committed to enhancing the robustness of its sustainability data. As part of its continuous improvement strategy, the company aims to expand the use of supplier-specific data, particularly for purchased goods, by obtaining more detailed information on material compositions and product carbon footprints.

A corresponding note on the data source and estimation method is included in each relevant section of the report, in line with ESRS 2 and ESRS 1 section 7.2 on estimation and outcome uncertainty.

### RESTATEMENTS

Restatements were made in the following chapters:

| TOPIC | SUBTOPIC | RESTATEMENT<br>REASON AND EFFECT |
|---|---|---|
| Emissions measurement DT Swiss Group | Emission Factor Carbon Fiber | For our Scope 3.1 CCF measurement in 2023, the Ecoinvent 3.10 data base was used for the activity based reporting on purchased goods and services.<br>With the update of the data base to the version 3.11, the emission factor for carbon fiber changed significantly. After the consultation of experts in the bicycle industry, we received confirmation that the 3.11 value is more realistic for carbon products in the bicycle industry than the value from the 3.10 version. Therefore, the emission factor was exchanged. As this change has drastically altered (reduced) the group result and exceeded the 5% threshold specified in the restatement policy, the figures for 2023 have been adapted accordingly. |

ESRS 2, SBM-1

# STRATEGY, BUSINESS MODEL AND VALUE CHAIN

The legal name of the company is DT Swiss AG. DT Swiss is owned by families Boeckmann and D'Alberto. In addition to its headquarters in Biel, Switzerland, DT Swiss has subsidiaries in the United States, France, Germany, Poland and Taiwan.

DT Swiss is one of the worldwide leading brands in the field of bicycle components. With four production facilities around the globe, DT Swiss is able to produce close to the markets where the products are sold. This is done in cooperation with a significant number of local suppliers at the respective locations. As DT Swiss products are offered globally, different modern production sites in Poland, Taiwan, Switzerland and the US help to keep transportation routes comparatively short. Like this, it is also possible to meet high environmental and social standards at these sites.

The product portfolio of DT Swiss AG includes nine product groups: spokes, nipples, rims, hubs, wheelsets, shocks, dropper posts, forks and brakes. For all product groups, the maxims of reliability have been pursued in the product development process from the very start. With proper maintenance and repair, DT Swiss products can be used for decades.

When speaking about the own workforce, DT Swiss follows an ambitious yet appreciative approach to one another, recognizing the uniqueness of employees, supporting them in their personal growth, and striving together for exceptional performance.

Comprehensive relationship management and the focus on customer needs, enables the alignment of diverse stakeholder interests. Digitalization and smart standardization offer potential to address the growing expectations of customers, business partners, political and social interest groups. Strengthening the integration of material and information flows with partners supports progress in resource efficiency, conservation, reusable systems, and demand-driven production planning.

1. DT Swiss AG, Biel/Bienne Switzerland
2. DT Swiss Inc., Grand Junction, USA
3. DT Swiss (Asia) Ltd., Taichung, Taiwan
4. DT Swiss Polska Sp. z o.o., Oborniki, Poland
5. DT Swiss (France) S.A.S., Le Bar sur Loup, France
6. DT Swiss Deutschland GmbH, Oelde, Germany
7. Trickstuff GmbH, Pfaffenweiler, Germany

**OUR MISSION**

# DT Swiss meticulously develops high-performance cycling components that provide a competitive edge to every ambitious cyclist*.

*If you have a goal you are ambitious.

ESRS 2, SBM-1

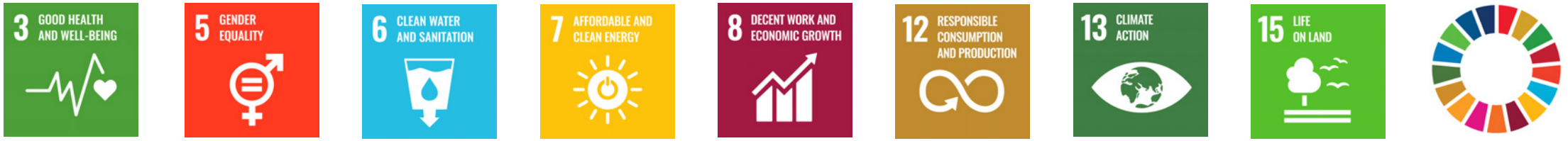
# STRATEGY, BUSINESS MODEL AND VALUE CHAIN

## ALIGNMENT WITH THE SUSTAINABLE DEVELOPMENT GOALS (SDGS)

As a globally active company with subsidiaries in Europe, Asia, and the Americas, DT Swiss operates in a complex regulatory and cultural environment. This diversity presents challenges in defining shared sustainability objectives and establishing a common language for responsible business practices across regions.

The United Nations Sustainable Development Goals (SDGs) offer a globally recognized framework for addressing environmental, social, and economic challenges. All countries in which DT Swiss operates have endorsed the SDGs and developed national strategies to support their implementation. These goals therefore also serve as a relevant reference point for DT Swiss in shaping its own contribution to sustainable development.

To assess its alignment with the SDGs, DT Swiss conducted a structured evaluation of all 17 goals, including their sub-targets and indicators. This process included an internal workshop to identify the goals where the company can have the most meaningful impact.
As a result of this assessment, eight SDGs were identified as particularly relevant to DT Swiss's operations and areas of influence. These goals represent the company's current focus for contributing to global sustainability efforts.




[1] The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States

ESRS 2, SBM-1

# **STRATEGY, BUSINESS MODEL** AND **VALUE CHAIN**

### THE DT SWISS VALUE CHAIN – UPSTREAM & OWN OPERATIONS

The upstream DT Swiss value chain encompasses raw material extraction, further processing of the extracted materials, and the creation of semi-finished and finished products. Transportation between the individual production steps is also part of the up- and downstream value chain.

A high percentage of stakeholders in the upstream value chain are based in Asia and Europe; a smaller part of the network is located in America. Our main suppliers are material suppliers, especially for metal, fiber composite and cardboard.

DT Swiss's own operations include the development, manufacturing, and assembly of spokes, nipples, hubs, rims, complete wheelsets, suspension forks, shocks, dropper posts and brakes. This also includes the storage and logistics of the semi-finished and finished components. Product development takes place at the company's headquarters in Switzerland, while sales is decentralized via DT Swiss locations in Switzerland, Germany, France, Taiwan and the US. Service is offered at all DT Swiss subsidiaries.

### THE DT SWISS VALUE CHAIN - DOWNSTREAM

The downstream supply chain consists of supplying the original equipment market (OEM) and the aftermarket (ASM). In the original equipment market, DT Swiss components are assembled into complete bikes and sold to end consumers. In the aftermarket, DT Swiss components are made available to end customers via distributors.
Direct contact with end consumers exists through Service Centers, events and social media. The downstream supply chain is completed by the use of the products installed in the bicycle and the end-of-life phase.

ESRS 2, SBM-2

# STRATEGY, BUSINESS MODEL AND VALUE CHAIN

### INTERESTS AND VIEWS OF STAKEHOLDERS

DT Swiss engages with a wide range of stakeholders through various forms of interaction. To continuously balance the interests of the relevant stakeholder groups, it is essential for the success of the company to take into account the different perspectives, interests, and expectations of each stakeholder group. The insights gathered from these engagements have been integral to the Double Materiality Assessment and have also informed other strategic and operational decisions that shape the future of DT Swiss. The stakeholder engagement is tailored to the specific characteristics and relevance of each group, as outlined in the accompanying table. To ensure structured and effective dialogue, stakeholders are categorized into three groups based on the intensity and frequency of interaction. Group 1 represents those with whom the closest and most continuous collaboration is maintained. This segmentation allows DT Swiss to prioritize engagement efforts and respond more effectively to stakeholder needs.

**1**

EMPLOYEES
SUBSIDIARIES
OWNER
SUPPLIER
OEM CUSTOMERS
ASM CUSTOMERS

**2**

BIKE SHOPS
END CUSTOMERS
BANK / INSURANCE

**3**

FISCAL ADMINISTRATION
MUNICIPALITY
STATE
MEDIA
EDUCATIONAL INSTITUTIONS
ASSOCIATIONS
ATHLETES
EXTERNAL MONITORING INSTITUTIONS

| STAKEHOLDER GROUP | ENGAGEMENT |
|---|---|
| **EMPLOYEES** | Employee appraisals, Personnel information, bilateral meetings, Intranet |
| **SUBSIDIARIES** | Coordination meetings, reportings, intranet, physical visits |
| **OWNER** | General meetings, board of directors' meetings |
| **SUPPLIER** | Coordination meetings, contracts, Code of Conduct |
| **OEM CUSTOMERS** | Exchange meetings with sales, feedback, trade fairs |
| **ASM CUSTOMERS** | Exchange meetings with sales, feedback, trade fairs |
| **BIKE SHOPS** | Exchange meetings via distributors, DT Swiss Academy, Service Center, social media, press, e-mail |
| **END CUSTOMERS** | Feedback via distributors and sales reps, events, market analysis, Service Center, social media, press, e-mail |
| **BANK / INSURANCE** | Reporting |
| **FISCAL ADMINISTRATION** | Reporting |
| **MUNICIPALITY** | Reporting |
| **STATE** | On request |
| **MEDIA** | Interviews, personal contacts |
| **EDUCATIONAL INSTITUTIONS** | Job fairs, personal contacts |
| **ASSOCIATIONS** | Meetings, newsletter |
| **ATHLETES** | Events, interviews, company tours |
| **EXTERNAL MONITORING INSTITUTIONS** | Contracts, audits, meetings |

ESRS 2, GOV-1, GOV-2

# ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

The governance body of DT Swiss consists of a core management board. Moreover, a board of directors meets twice a year to discuss relevant business developments.
The sustainability governance body at DT Swiss is called the CSR Committee. The committee is coordinated by a project manager. The decision-makers within the committee consist of one woman and five men, who hold the highest management positions representing human resources, finance, technology, procurement, production, product management, and sales and marketing. All six committee members are part of the core management team. As of 31 December 2024 employee representatives and external stakeholders were not included in any of the bodies. There is no independent board member in any of the bodies.

The composition of the CSR committee is reviewed annually on the basis of responsibility within the organization and experience in the respective aspects. The performance evaluation and review is executed by the board members of the group periodically at least once a year.

Through monthly exchange meetings, material impacts, risks and opportunities are jointly monitored and resulting projects and decisions are developed, prioritized, analyzed and implemented. In addition, it is the responsibility of the CSR Committee to conduct an ongoing sustainability risk assessment, to define clear goals in the area of sustainability and to assign responsibilities accordingly. Training and knowledge transfer on sustainability topics is mainly conducted to the CSR committee via the sustainability project manager. External support is provided by a sustainability consultancy, which is consulted upon request. With monthly bilateral meetings, representatives from all subsidiaries are proactively involved in the management of sustainability topics at their sites.

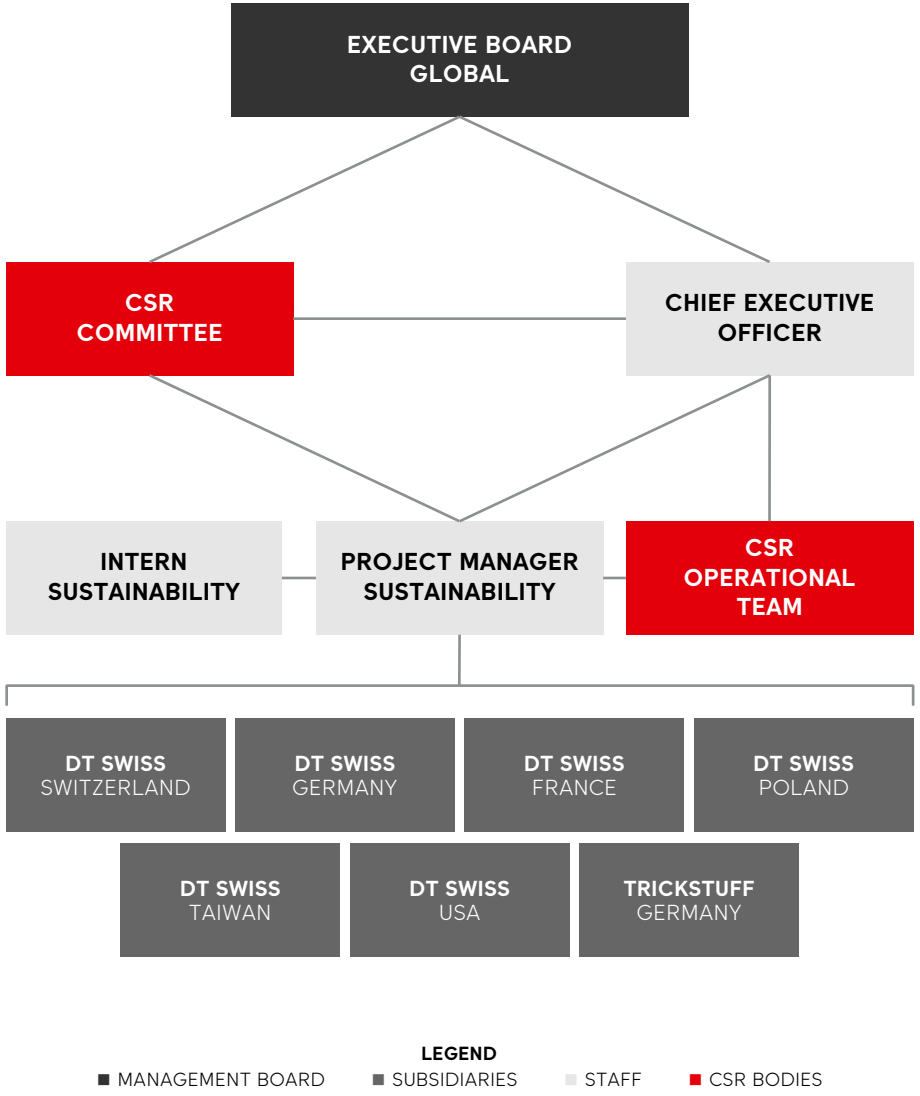
ESRS 2, GOV-1, GOV-2, GOV-3

# ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

A CSR operational team was founded in 2023 for the operational implementation of goals and projects. With representatives from Supply Chain, Sales Administration, Quality Management, Human Resources, Controlling, Engineering and Accounting, the team aims to find efficient ways of anchoring sustainability issues in the company structure in the long term.
The chair of both the CSR committee and the CSR operational team is held by the CFO of the company.
The reason for this is the importance of corporate social responsibility, the merging of internal interfaces, and the financial overview of opportunities and risks. This position is also responsible for the implementation of a groupwide due diligence process. Moreover, exchanges with external stakeholders such as insurance companies, banks and consultancies are handled by the CFO.
The sustainability project manager directly reports to the CFO. Additionally, support was recruited in 2024 in the area of Product Carbon Footprint (PCF) measurement to strengthen the efforts in the field of ecological sustainability.

## FINANCIALS AND INCENTIVE SCHEMES

In general, remuneration is evaluated annually based on duties, competencies, responsibilities and experiences. Respective adaptations are requested to the board of the group and released accordingly.
There is no separate remuneration for the members of the CSR Committee. Remuneration takes place for their main functionality, based on duties, competencies, responsibilities, experiences and respective market evaluations.
DT Swiss is not integrating any incentive systems for members of the management and supervisory bodies that are linked to sustainability aspects.
The total revenue and remunerations are published in the financial statement of the group which are not publicly available.



ESRS 2, GOV-4

# DUE DILIGENCE

DT Swiss is in the early stages of implementing structured due diligence processes in accordance with ESRS 2, GOV-4. While some first steps have already been taken, the company acknowledges that its current approach is still under development and will require further optimization in the coming years.

In 2022, DT Swiss initiated its first risk assessment of direct suppliers, marking the beginning of a more systematic approach to identifying potential adverse impacts in the supply chain. This initial assessment was based on:

- Country-level risks, evaluated using publicly available indices (e.g., HDI, CPI, EPI, Global rights index and others),
- And sector-specific risks, analyzed using the MVO Risk Filter Tool.

The methodology applied to date is preliminary and not yet embedded in governance, strategy and business model systems. DT Swiss is actively working to integrate risk analysis into existing digital tools and to align it with a more robust and standardized supplier evaluation framework.
As part of its early risk mitigation efforts, DT Swiss has:

- Developed and distributed a Supplier Code of Conduct, outlining expectations regarding ethical, social, and environmental standards.
- Launched an online whistleblower tool in 2024, currently accessible only to internal employees.

DT Swiss has recognized the importance of accessible grievance mechanisms and has set the goal of expanding access to the online whistleblowing software by 2025 and making the tool available to all stakeholders online via the website.

The company aims to establish a comprehensive due diligence system based on the OECD Guidelines for Multinational Enterprises, which provides for a standardized process, continuous improvement, and transparency with regard to current restrictions and measures. At the same time, the OECD guidelines help to track the effectiveness of the efforts.

Since this project is very comprehensive and must be integrated into the company's operations, the scope will initially be limited and focuses exclusively on the upper aluminum value chain. This will ensure that processes can be reviewed and critically examined in order to make adjustments, incorporate and establish a solution that is a good and viable option for all parties involved before it is made available to all relevant stakeholder groups.

Given the company's dual role as both a supplier and a brand, it became evident that solutions designed primarily for brands may not always align with the realities and needs of suppliers. This unique position underscores the importance of promoting mutual understanding and cooperation along the entire value chain to fulfill due diligence obligations for each individual element of the value chain as effectively as possible.

ESRS 2, GOV-4

# **POLICY** AND **COMPLIANCE**

DT Swiss has developed a Code of Conduct to guide ethical conduct and regulatory compliance across its operations. It provides guidance for day-to-day decision-making and promotes respectful interaction, transparent communication, and the prevention of misconduct, including corruption and abuse. It outlines principles related to interpersonal behavior, safety, information handling, competition, property, financial integrity, and environmental responsibility. In 2024, additional e-learning modules were developed in English, Polish, Traditional Chinese, and Vietnamese to provide a more detailed understanding of the Code of Conduct.

In addition to the Code of Conduct, DT Swiss has implemented further policies covering data privacy, hazardous materials management, occupational health and safety, and local employment regulations. All policies are developed or authorized by a legal entity and approved by the executive board or ownership.

Compliance with applicable local and international laws and regulations is a core principle of DT Swiss's operations. Local management teams are responsible for monitoring and implementing changes in national legislation, while the global management team observes and responds to international frameworks and initiatives, such as those issued by the OECD.

In the reporting year 2024, no incidents of non-compliance with laws or regulations resulting in fines or non-monetary sanctions were recorded across the DT Swiss Group.

# 3

# DOUBLE MATERIALITY ASSESSMENT

DT SWISS

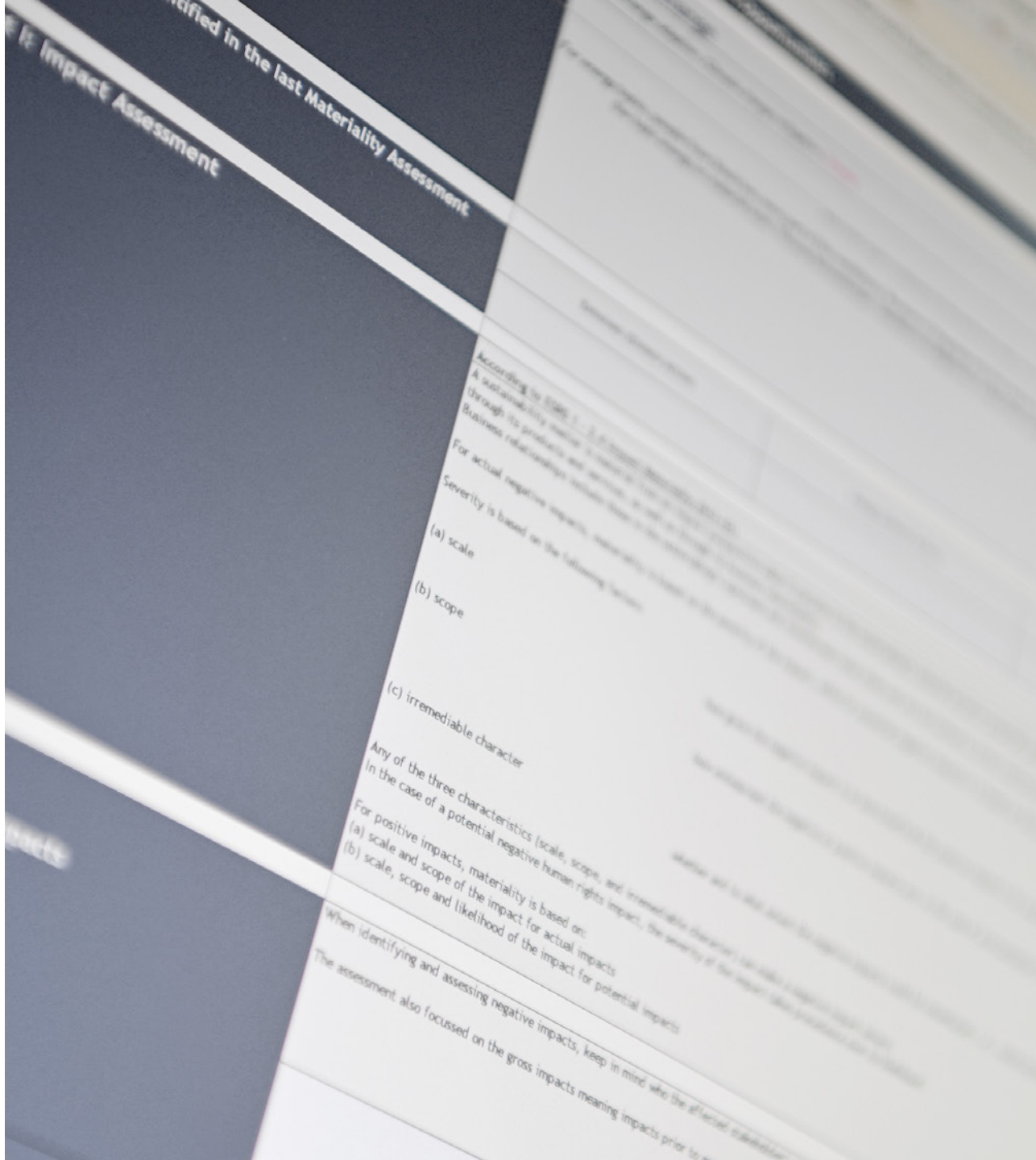
ESRS 2, IRO-1

# DOUBLE MATERIALITY ASSESSMENT 2022 / 2024-2025

To examine all aspects of sustainability that are relevant for DT Swiss, a first materiality analysis was conducted in 2022. The long list that built the foundation of this analysis was based on the topic standards mentioned in the GRI, surveys of selected OEM and ASM customers, suppliers, and interviews with owners, management, and employees. At the same time, sustainability reports from the industry were analyzed and experts were consulted at trade fairs and events.
This approach guaranteed a good understanding of which of the business activities have a positive and negative impact on the environment and society.

The materiality analysis was conducted again in 2024/2025. As required by CSRD, a double materiality analysis was carried out based on ESRS 1, together with the support of a consultancy. In an initial workshop, the procedure was explained and the results of a peer analysis and media screening, as well as the long list, was presented. The long list referred to the key topics of ESRS according to ESRS 1 AR 16, including sub-topics and sub-sub-topics. The stakeholder engagements and results of the materiality analysis conducted in 2022 were also integrated into the long list, as were the results of the peer analysis and media screening.

The field of cybersecurity was also included in the analysis as an entity-specific topic.



ESRS 2, IRO-1, IRO-2

# **DOUBLE MATERIALITY ASSESSMENT** 2022 / 2024-2025

All topics identified in the initial step were clustered and prepared using IRO assessment templates. The granularity of the topic areas was adapted to DT Swiss circumstances, meaning that some topics were analyzed down to sub-subtopics, while others were examined at an aggregated level. The topics were then discussed and evaluated in workshops with internal experts. The stakeholder perspective was represented by the topic owner. During the workshops, current and potential positive and negative impacts, risks, and opportunities were analyzed according to the following scheme:

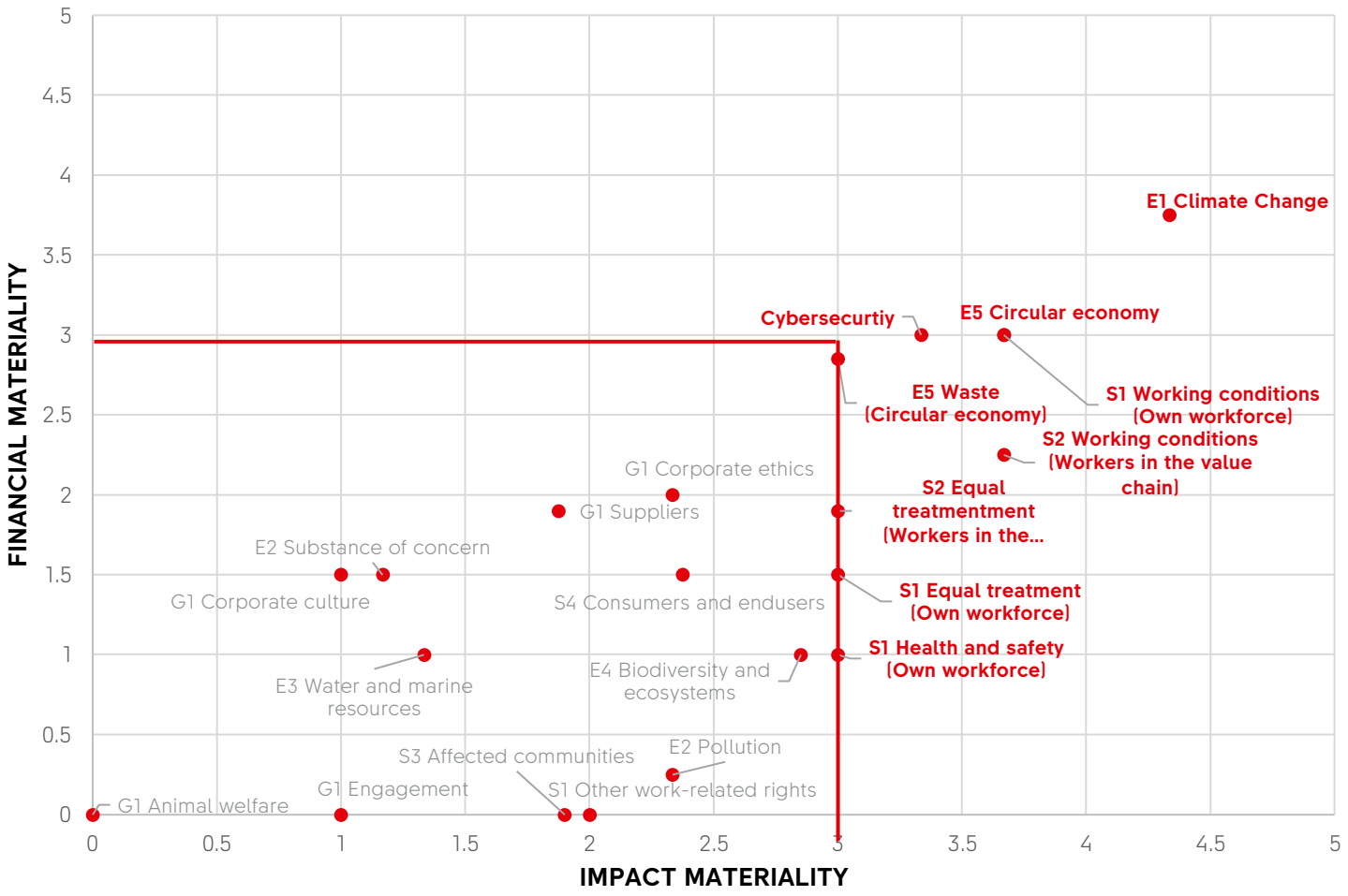
1. Individual preparatory task for all workshop participants on the ESRS topics, subtopics, and sub-subtopics relevant to this IRO assessment to get familiarized with DMA methodology
2. Summary of results and prioritization of the ideas generated by the preparatory tasks on positive and negative impacts as well as opportunities and risks
3. Assignment of IROs along the value chain
4. Definition of the time horizon of the IRO (short- , medium- , long-)
5. Assessment of the impacts according to severity, scale, scope, remendability, and likelihood on a scale of 1-5, using a gross perspective without including mitigation measures
6. Assessment of risks and opportunities based on financial magnitude and likelihood
7. Feedback loop through consultancy
8. Implementation of ESRS 1 § 45 by hardcoding the likelihood for human rights-related issues
9. Internal threshold setting to 3. If the defined threshold was exceeded, classification of the IRO as material

In some cases, assumptions had to be made in order to enable a uniform assessment, particularly for IROs along the value chain. Past, present, and future IROs were taken into account in the assessment and corresponding conclusions were drawn.

The IROs identified in this process show which key topics are relevant to DT Swiss's business model. This report aims to provide transparent reporting on these topics.

All identified IROs are reviewed annually in order to make any necessary adjustments to their priority and to include new material topics.

# **DOUBLE MATERIALITY ASSESSMENT** 2022 / 2024-2025




| MATERIAL TOPICS – OVERVIEW WITHOUT SUBTOPICS |
|---|
| E1 Climate Change |
| E5 Resource Use and Circular Economy |
| S1 Own Workforce |
| S2 Workers in the value chain |
| Cybersecurity |

ESRS 2, SBM-3

# **IMPACTS, RISKS** AND **OPPORTUNITIES**

| IMPACT | DECSRIPTION | VALUE CHAIN ALLOCATION | IMPACT CATEGORY | ALLOCATED MATERIAL TOPIC |
|---|---|---|---|---|
| 1 | Energy-intensive production processes contribute to the acceleration of climate change due to the partial use of non-renewable resources. | This impact is allocated at DT Swiss operations | Negative impact | E1 Climate Change |
| 2 | Significant energy-related emissions arise across the upstream value chain, particularly during the extraction and further processing of (raw) materials. | This impact is allocated in the upstream value chain starting from direct suppliers until Tier-n | Negative impact | E1 Climate Change |
| 3 | Logistics-related emissions are generated through the global transportation of semi-finished and finished products by road, sea, and air. | This impact is allocated along the whole up- and downstream value chain, including intercompany logistics operations | Negative impact | E1 Climate Change |
| 4 | The transition to renewable energy sources and the introduction of energy-efficient technologies involve significant investments. | This risk mainly focuses on DT Swiss production sites but can also be extended to the value chain | Financial risk | E1 Climate Change |
| 5 | Usage of primary raw materials with limited recyclability. End-of-life options are often restricted to downcycling, thermal recovery, or disposal. | The impact is allocated at DT Swiss operations and in the upstream value chain of direct suppliers. | Negative impact | E5 Resource Use and Circular Economy |
| 6 | Dependence on a geographically concentrated supply chain constrains circular economy progress due to limited material availability, low recycling rates, extended transport distances, and high packaging intensity. | This impact is allocated in the upstream value chain starting from direct suppliers until Tier-n | Negative impact | E5 Resource Use and Circular Economy |
| 7 | The commitment to product durability and modular design for facilitated maintenance and repair supports circular economy principles by extending product lifespans, reducing waste, and enabling component reuse. | This impact is allocated at DT Swiss operations | Positive impact | E5 Resource Use and Circular Economy |
| 8 | Advancing the use of sustainable materials and circular design principles in product development offers a competitive advantage, enabling innovation, regulatory alignment, and long-term value creation. | This opportunity focuses on DT Swiss operations | Financial opportunity | E5 Resource Use and Circular Economy |
| 9 | Fast moving markets can result in misaligned production planning, leading to functional yet outdated products that are prematurely discarded, thereby increasing material waste. | This impact is allocated at DT Swiss operations | Negative impact | E5 Resource Use and Circular Economy (waste) |

ESRS 2, SBM-3

# IMPACTS, RISKS AND OPPORTUNITIES

| IMPACT | DECSRIPTION | VALUE CHAIN ALLOCATION | IMPACT CATEGORY | ALLOCATED MATERIAL TOPIC |
|---|---|---|---|---|
| 10 | A high-performance culture can lead to elevated workloads and extended working hours, potentially impacting employee well-being. | This impact is allocated at DT Swiss operations | Negative impact | S1 Own Workforce |
| 11 | Employees that earn minimum wage or slightly above may face financial strain due to rising living costs. | This impact focuses on DT Swiss operations | Negative impact | S1 Own Workforce |
| 12 | Stringent labor regulations and administrative requirements can reduce organizational flexibility, leading to increased compliance costs and higher personnel expenses. | This risk is allocated at DT Swiss operations | Financial risk | S1 Own Workforce |
| 13 | Manual labor work with risk of workplace accidents. | This impact is allocated at DT Swiss operations | Negative impact | S1 Own Workforce |
| 14 | Repetitive labor work with risk of overloads. | This impact is allocated at DT Swiss operations | Negative impact | S1 Own Workforce |
| 15 | Perception of limited transparency, especially in compensation structures. | This impact is allocated at DT Swiss operations | Negative impact | S1 Own Workforce |
| 16 | Long working hours and high pressure can negatively influence health and safety of workers in the value chain. | This impact is allocated in the upstream value chain at direct suppliers and possibly further down the value chain | Negative impact | S2 Workers in the value chain |
| 17 | Inappropriate wage practices and restrictive working conditions could impair workers' ability to meet their basic needs and raise concerns about fair treatment. | This impact is allocated in the upstream value chain | Negative impact | S2 Workers in the value chain |
| 18 | Payment of recruitment fees by migrant workers. | This impact is allocated in the upstream value chain at direct suppliers and possibly further down the value chain | Negative impact | S2 Workers in the value chain |
| 19 | As digital integration of business operations expands, uninterrupted data access becomes essential. Cyber incidents or system disruptions may significantly impact operational continuity. | This impact is allocated at DT Swiss operations | Financial Risk | Cybersecurity |

ESRS 2, IRO-1, IRO-2

# DOUBLE MATERIALITY ASSESSMENT 2024-2025

Compared to the materiality analysis of 2022, material topics have been redefined and the overall amount was reduced to follow the principle of quality over quantity. This means that the identified topics are dealt with and addressed in greater detail. This is the only way to ensure transparency and completeness of the topics identified, taking into account the resources available.

The material topic DT Swiss Factory Squad stays material but is renamed to reflect the wording of the ESRS data points on "Own Workforce." Climate Action becomes "Climate Change," Circular Economy becomes "Resource use and circular economy," and transparency in the value chain now focuses exclusively on workers in the value chain and becomes "Workers in the value chain." A new material topic is cyber security, which is listed as an entity-specific topic.

The topics of company strategy, engagement, water management and biodiversity are no longer mentioned, as they were already second priority in last years report and, as of today, fall out of the scope completely with the new assessment and defined threshold. However, as there are overlaps with other areas within this report, it is possible that individual topics will be addressed in general disclosures or, for example, in the climate change chapters.

After analyzing and defining material topics, another important step is to consider the listed IROs in the strategy, business model, and supply chain and to initiate appropriate measures where necessary. This integration is essential not only at the corporate level but also across all subsidiaries and departments.

To ensure effective implementation, it is crucial that responsible departments clearly understand their roles in this transformation journey. They must be aware of how their actions and decision making can contribute to mitigating negative impacts and risks, while also supporting the realization of sustainability-related opportunities. Embedding these considerations into day-to-day work is a central criteria toward building a more resilient and future-oriented organization. DT Swiss is at the beginning of the process of integrating CSR issues into its organizational structures step by step.

DT SWISS

# 4

# CLIMATE CHANGE

# CLIMATE **CHANGE**

DT SWISS

# 4.1

# GENERAL INFORMATION

DT SWISS

ESRS 2, SBM-3, IRO-1, E 1

# GENERAL INFORMATION

DT Swiss products are designed to be used outdoors and thus it is the duty of the company to take responsibility for business actions and protect the environment within the scope of influence. As a manufacturing and global company with business activities that have a great impact on the environment, it is the company's duty to analyze where negative impacts can be minimized, and financial risks reduced.

Within the Double Materiality Analysis, DT Swiss reviewed climate-related risks relevant to its business model. This initial analysis focused on the current state of operations. High-emission climate scenarios have only been considered through benchmarking against peer companies with comparable business models. A detailed evaluation of the company's exposure and sensitivity to climate risks is still pending, as is a comprehensive resilience analysis. The analysis has identified three negative impacts and one transitional risk that DT Swiss has currently.

1. The manufacture and distribution of DT Swiss components at its in-house production facilities are energy-intensive and, depending on the energy sources used, leave a large carbon footprint.
2. Emissions arise in the up- and downstream value chain through transportation and, more importantly,
3. in upstream value creation during the extraction of raw materials and in further processing steps involving the use of metals or fiber-reinforced plastics.

At the same time, however, it is necessary to take into account the financial consequences of the transition to energy supply from renewable sources. Switching to renewable energy sources initially represents a financial outlay, and thus, a transitional risk, that should not be underestimated, especially for the high demands of energy that manufacturing companies have.

E 1 -1

# **GENERAL** INFORMATION

Taking all the aspects mentioned and the anticipated impacts of climate change into account, DT Swiss has already begun working on a transition plan by measuring Scope 1-3 emissions and setting targets for Scopes 1 and 2. In addition, levers and key actions have already been defined to mitigate negative impacts. They are described in detail in the respective section.

However, the plan needs to be expanded to include:
- an analysis of whether potential lock-in emissions could arise
- an explanation of how the business model will be adapted to future environmental, social, and regulatory changes
- the integration into existing business processes, including budget planning.

It must take into account identified negative impacts and financial risks, while supporting the company's objectives for economic growth and long-term success. Since negative impacts and risks can change over time, climate risk analysis must be an integral part of the transition plan in order to anticipate adjustments to corporate strategy and governance structures in a timely manner.

Since 2022, emissions have been measured at the company level for all DT Swiss subsidiaries. At that time, the scope did not yet cover all relevant business activities. The first complete measurement carried out independently in accordance with the *GHG Protocol: A Corporate Accounting and Reporting Standard* was performed in 2023, before the defined scope was then adapted for the year 2022 and 2024.
DT Swiss received support in this process from a sustainability consultancy, which provided advice on questions relating to emission factors, scope determination, and other topics. The calculation itself was carried out using a specialized ESG software solution.

The findings help to identify all areas in own operations and along the value chain with emission reduction potential.
At the same time, the analysis helps the company to analyze production and organizational processes and make them more resource and cost-efficient.

DT SWISS

# 4.2

# LEVERS AND KEY ACTIONS

E 1 – 3

# LEVERS AND ACTIONS **SCOPE 1,2,3**

## DECARBONIZATION OF SCOPE 1 AND 2

Within Scope 1 and 2 emissions, electricity and heating are of comparable relevance, followed at a greater distance by emissions generated by DT Swiss company cars, which is why the focus will initially be on electricity and heating. With the switch from natural gas to biogas in Switzerland in 2022 and the installation of solar power systems in Switzerland in 2023 and in Germany in 2024, measures have already been implemented that positively contribute to achieving the reduction targets. The remaining energy demand in Switzerland is covered by purchased hydropower. Solar power systems for France and the US have also been approved and will be installed in 2025.
The major lever, but also a major challenge, is the energy supply at the Polish site. Here, electricity is currently covered by Energy Attribute Certificates (EACs), as the investment in a solar power system is difficult to justify from an economic point of view, which has also been confirmed by external energy experts. Moreover, as of today, there is no suitable solution for the procurement of energy for heating with renewable sources. Therefore, the search for ecologically and financially viable solutions continues. One positive development is the energy optimization of some Polish production processes, described in detail in the production processes case study in the chapter Resource Use and Circular Economy.
At DT Swiss (Asia) LTD it is also necessary to look for ways to optimize the energy demand for operations in order to replace the comparatively high proportion of fossil fuels with renewable energy sources. At one of the buildings where DT Swiss (Asia) LTD subsidiary is located, a solar power system was installed in September 2022. Possibilities to expand solar systems are being examined. Additionally, to avoid using large cars for short journeys, employees at DT Swiss (Asia) LTD. have access to 4 e-scooters that can be charged on the company premises.

## DECARBONIZATION OF SCOPE 3

DT Swiss's value chain is not yet fully transparent, which is why there is still not complete clarity regarding all climate-related impacts. Despite long-standing relationships with certain suppliers, the assessment of emissions performance and energy management practices across suppliers and sub-suppliers has not yet been prioritized. Since sourcing low-impact aluminum has been identified as a key lever for reducing Scope 3.1 emissions, the importance of close collaboration on environmental issues is increasing. Initial discussions and feedback from European aluminum suppliers suggest that the materials provided already contain a significant proportion of recycled content. However, these factors have not yet been incorporated into existing emissions calculations.
DT Swiss is working to increase transparency to obtain detailed information about the share of recycled input material, with the aim of identifying further optimization opportunities. Beyond increasing recycling rates, sourcing aluminum produced with renewable energy represents an alternative and effective strategy for further reducing Scope 3 emissions.
Speaking about carbon fiber, expanded in-house production enables greater influence over energy sources, thereby contributing to a further reduction in emissions.
The reduction of packaging materials through the use of reusable packaging systems will also positively contribute to reducing Scope 3.1 emissions.
A crucial next step is to establish a clear and solid foundation for the current practices of Tier 1 suppliers and to gain a better understanding of exactly what is being sourced and where appropriate measures can be taken. This assessment will serve as the baseline for developing targeted measures to reduce upstream emissions.

# CASE STUDY: **CARBON FOOTPRINT OF DT SWISS SPOKES**

How many emissions are associated with DT Swiss components, and what are the biggest levers for emission reduction? To address this increasingly relevant question—not only for internal purposes but also for customer requests—DT Swiss initiated its first Product Carbon Footprint (PCF) assessment in 2024 as part of a dedicated project.

The objective was to gain insights into the composition of a component's PCF and to understand the level of effort required to obtain valid and meaningful measurement results. The DT AERO COMP® (J-BEND) spoke was selected as the pilot product. The assessment focused on cradle-to-gate emissions, covering all emissions from raw material extraction to the completion of manufacturing at the DT Swiss production site in Switzerland. The ISO 14067 standard served as the methodological basis for the carbon footprint quantification; however, the approach has not been submitted for official third-party verification to date.

Given that DT Swiss spokes are available in over 8500 different versions (taking into account type and size), the project aimed to develop a flexible working document. The developed tool allows for manual adjustments of parameters such as spoke weights, suppliers, and process steps, enabling scalable and reliable emissions calculations across the entire spoke product range.
After approximately five months of work, the project successfully delivered robust data on the emissions associated with spokes manufactured at the Swiss site.

**SPOKES**
**8677** different versions available at DT Swiss

**TOTAL EMISSIONS**
Between **15.3 and 27.4 g $CO_2e$** depending on the type of the spoke

**RAW MATERIAL & UPSTREAM VALUE CHAIN**
Between **68.2 % and 84.1 %** of $CO_2$ emissions attributable to raw materials and further production at supplier's site.

**TRANSPORTATION**
Between **15.6 % and 31.5 %** of $CO_2$ emissions attributable to transportation

**IN-HOUSE ELECTRICITY**
Between **0.2 % and 0.4 %** of $CO_2$ emissions attributable to electricity from internal production processes

DT SWISS

# 4.3

# TARGETS

E 1 – 4

# CLIMATE CHANGE **TARGETS**

As is usual for manufacturing companies, most emissions occur in the value chain and account for by far the largest share of DT Swiss's emissions. For this reason, a target was set to formulate a reduction target for Scope 3 by 2024. However, as a number of assumptions and estimates have been made in this area, the data basis is not yet sufficient to set well-founded targets. Therefore, the target needs to be postponed.

More specific and realistic data is available for Scope 1 and 2 emissions. The target already set for this area is a combined target and refers to the whole DT Swiss group. The same assumptions apply to the energy target.

Long-term targets beyond 2030 have not yet been defined and official validation by the Science Based Targets Initiative (SBTi) has not yet been carried out.

Calculating the carbon footprint of products (PCF) has proven to be very time-consuming, even for low-complexity components such as spokes. Therefore, the timeline for conducting these assessments will likely need to be extended.
Once reliable data is available, it can be used to define more targeted sustainability measures, such as minimum thresholds for recycled raw materials, improved product design, or optimized transportation and packaging. To make this possible, a more comprehensive database is needed to identify the most effective levers within DT Swiss's product development processes.

| DEFINED TARGETS | CURRENT PROGRESS | NECESSARY ADAPTATIONS | SDG[1] |
|---|---|---|---|
| **Reduce Scope 1 and 2 emissions by 55% by 2030 with base year 2022.** (Absolute and group wide target) | Ongoing | No adaptations necessary |  |
| **Set Scope 3 target with compliance date by 2030 in 2024** | Not achieved | Postponed to 2026 | |
| **70% of the energy demand is covered by renewable resources by 2030 for the whole DT Swiss Group** | Ongoing | No adaptations necessary |  |
| **Conduct an environmental risk analysis in 2025** | Partly achieved (as part of the DMA) | Needs to be expanded to include climate risk scenarios |  |
| **Measure carbon footprint for DT Swiss' core products by 2025** | Ongoing | Highly likely that not all core products are measured by 2025 |  |

[1]The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.

DT SWISS

# 4.4

# DATA

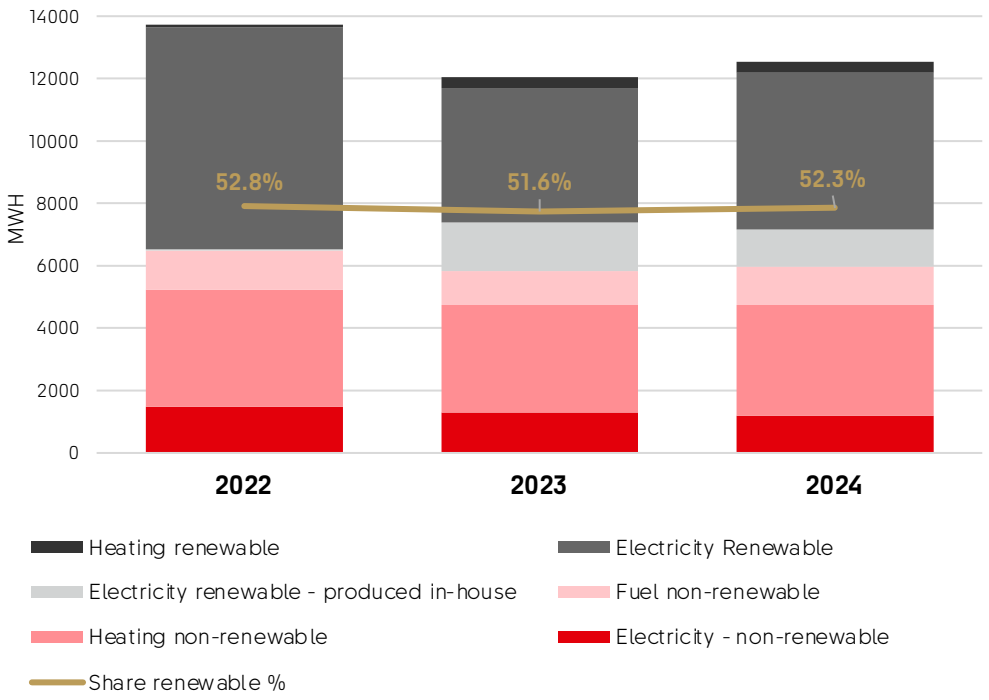
E 1 – 5

# ENERGY DATA
## DT SWISS GROUP

| | UNIT | 2024 | TREND[5] |
|---|---|---|---|
| **ENERGY CONSUMPTION FROM NON-RENEWABLERESOURCES[1]** | | | |
| ELECTRICITY | MWH | 1183.97 | (-9%) |
| HEATING[2] | MWH | 3568.64 | (+4%) |
| FUEL[3] | MWH | 1219.48 | (+12%) |
| **TOTAL FROM NON-RENEWABLE RESOURCES** | **MWH** | **5972.10** | **(+2%)** |
| **ENERGY CONSUMPTION FROM RENEWABLE RESOURCES[4]** | | | |
| IN-HOUSE PRODUCED ELECTRICITY | MWH | 1195.86 | (-23%) |
| PURCHASED ELECTRICITY | MWH | 5014.26 | (+16%) |
| HEATING | MWH | 351.02 | (+1%) |
| **TOTAL FROM RENEWABLE RESOURCES** | **MWH** | **6561.13** | **(+6%)** |
| **RENEWABLE ENERGY SOLD, BY USE** | | | |
| ELECTRICITY | MWH | 524.67 | (+24%) |
| **TOTAL[6]** (Rounding errors may occur) | **MWH** | **12049.09** | **(+3%)** |

[1]Non-renewable energy mix: Electricity from different non-renewable resources, heating from natural gas, fuel from liquid gas, petrol, diesel.
[2]In France and Germany, electricity is used for heating. Thus, the amount spent on heating is included in the number for electricity. In Taiwan there is no heating system. Data for heating with gas is derived from bills we pay. The gas data covers exactly one year but may not fit exactly into the period 01/01/24 to 12/31/24, since the billing period is different.
[3] Source of conversion factors (May 2025): https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024
[4]The Polish electricity demand is covered by EACs. Therefore, it is allocated under the section of renewable energies using wind power. Moreover, this section includes Biogas for heating in Switzerland and electricity from different renewable resources such as wind and hydro power. In-house produced electricity refers so solar installations.
[5]Comparison with previous year.
[6]The business activities of DT Swiss fall under NACE category C30.92 – Manufacture of bicycles and invalid carriages. While this category is part of Section C (Manufacturing), which is generally considered a high climate impact sector, the specific subgroup C30.92 is not explicitly listed.

Compared to the previous year, the energy consumption data have risen again, which is attributable to higher production capacity utilization. Thanks to the measures already implemented, DT Swiss remains on track to achieve the energy target. In the coming years, however, it will be crucial to find solutions in Poland.



# ELECTRICITY CONSUMPTION AND ENERGY INTENSITY RATES

| REGION | | ELECTRICITY IN MWH | | | ENERGY INTENSITY RATIO FOR BUILDING OPERATIONS[2] MJ/M2 | | | ENERGY INTENSITY RATIO BY FTE[3] MWH/FULL-TIME EMPLOYEE | | |
|---|---|---|---|---|---|---|---|---|---|---|
| | | 2022 | 2023 | **2024** | 2022 | 2023 | **2024** | 2022 | 2023 | **2024** |
| **DT SWISS AG** SWITZERLAND[1] | From renewable source | 4335.3 | 2376.9 (-45%) | **2949.7** (+24%) | 213.5 | 154.2 (-28%) | **186.7** (+21%) | 22.0 | 16.2 (-26%) | **20.6** (+27%) |
| | From non-renewable source | | | | | | | | | |
| **DT SWISS DEUTSCHLAND GMBH** GERMANY | From renewable source | 39.5 | 37.2 (-6%) | **36.4** (-2%) | 147.6 | 139.3 (-6%) | **141.1** (+1%) | 10.4 | 10.9 (+4%) | **9.5** (-12%) |
| | From non-renewable source | | | | | | | | | |
| **DT SWISS POLSKA SP. Z O.O.** POLAND[1] | From renewable source | 2769.5 | 2599.3 (-6%) | **2746.2** (+5%) | 355.9 | 341.4 (-4%) | **372.8** (+9%) | 7.6 | 11.0 (+45%) | **9.2** (-17%) |
| | From non-renewable source | | 60.5 (N/A)[4] | **47.3** (-22%) | | | | | | |
| **DT SWISS (ASIA) LTD.** TAIWAN[1] | From renewable source | | | | 86.3 | 70.7 (-18%) | **71.8** (+2%) | 6.2 | 7.4 (+20%) | **7.5** (+2%) |
| | From non-renewable source | 1191.3 | 975.44 (-18%) | **991.2** (+2%) | | | | | | |
| **DT SWISS INC.** UNITED STATES[1,5] | From renewable source | | | **117.1** | 90.3 | 93.5 (+4%) | **82.7** (-12%) | 11.0 | 17.9 (+63%) | **15.0** (-16%) |
| | From non-renewable source | 232.6 | 200.8 (-14%) | **84.8** | | | | | | |
| **DT SWISS (FRANCE) S.A.S** FRANCE | From renewable source | | | | 75.3 | 74.6 (-1%) | **66.6** (-11%) | 11.7 | 8.6 (-27%) | **10.1** (+17%) |
| | From non-renewable source | 66.9 | 68.0 (+2%) | **60.7** (-11%) | | | | | | |
| **TRICKSTUFF GMBH** GERMANY | From renewable source | 12.9 | 12.3 (-5%) | **10.6** (-14%) | 149.5 | 110.1 (-26%) | **127.5** (+16%) | 1.6 | 1.3 (-19%) | **1.7** (+30%) |
| | From non-renewable source | | | | | | | | | |

Rounding errors may occur

[1] Subsidiary with production

[2] The ratio was calculated as follows: ($\frac{\text{electricity, and heating consumption}}{\text{floor area}}$) x percentage of energy consumption for building operations). Source of conversion factors: https://www.gov.uk/government/publications/greenhouse-gas-reporting-conversion-factors-2024

[3] Including fuel, electricity, and heating consumption within the organization. Full-time employees (90 % or more workload) were calculated based on the head-count method on 31st December 2024.

[4] Electricity demand for the leased warehouse in Poland.

[5] Our subsidiary in the United States purchases electricity from the grid. The split between renewable and non-renewable electricity is based on the Energy mix from Colorado in 2023. In the report 2023 we categorized all electricity from the grid to be "non-renewable". Therefore, a comparison to previous years Is not applicable.

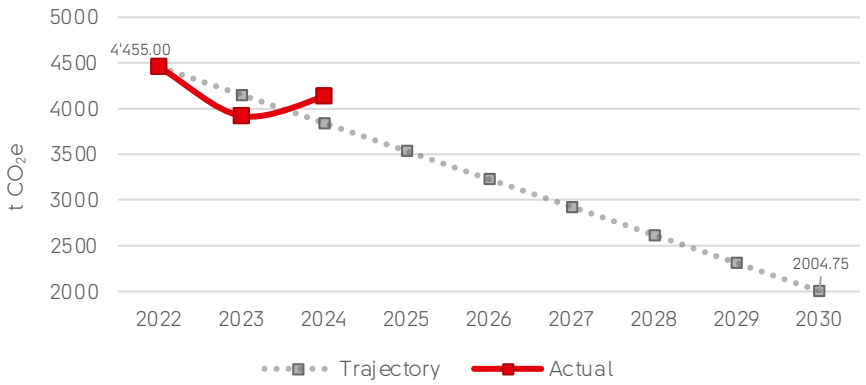
E 1 – 6

# EMISSIONS DATA
# DT SWISS GROUP **SCOPE 1 & 2**

The 2024 emissions measurement was carried out for all DT Swiss locations and is based on the internationally recognized standard of the *GHG Protocol: A Corporate Accounting and Reporting Standard*. With the help of a software, climate-relevant greenhouse gases that fall under the company's operational control were measured.

Restatements are performed if the total emission value would result in a cumulative change of five percent or more. In such cases, the base year is recalculated. Prerequisites for such recalculations include changes in scope consolidation, structural changes, methodological changes, data errors or changes due to external requirements.

The graph below shows the progress towards the goal set: -55 % Scope 1 & 2 emissions until 2030 with baseline 2022.




| CATEGORIES INCLUDED | t $CO_2e$ | TREND[1] |
|---|---|---|
| **SCOPE 1** | **1016.01** | (+11%) |
| STATIONARY COMBUSTION | **721.45** | (+ 7%) |
| MOBILE COMBUSTION | **283.64** | (+17%) |
| PROCESS OR FUGITIVE EMISSIONS | **10.52** | (+3499%) |
| **SCOPE 2** | | |
| LOCATION BASED | **3115.96** | (+4%) |
| MARKET BASED | **700.02** | (-0.3%) |

DT Swiss's Scope 1 emissions primarily result from the heating of buildings using fuels and from the operation of company vehicles. A minor share of emissions also arises from process-related activities and refrigerants used in air conditioning systems. Emission factors were provided by the external sustainability consultancy or sourced from internationally recognized databases. For emissions related to company vehicles, the Mobitool database was used as the primary reference.

Scope 2 location-based emissions at DT Swiss include purchased electricity. The corresponding emission factors were sourced from the Ecoinvent database. For the market-based approach, supplier-specific information was used, where available. In cases where such data could not be obtained, Ecoinvent was also used as the basis for emission factors. In Switzerland and at both subsidiaries in Germany, we source 100% green electricity from hydropower. In Poland, the Electricity Attribute Certificate certifies 100% wind power.

[1]Comparison to the previous year

E 1 – 6

# EMISSIONS DATA
# DT SWISS GROUP **SCOPE 3**

All Scope 3 categories relevant to DT Swiss's business model were taken into account in the emissions assessment and cross-checked with external consultants
The analysis includes all subsidiaries referenced in this report.

Scope 3.1: Purchased Goods and Services
– To calculate emissions from purchased goods and services, available data on purchased quantities and materials were collected and linked to emission factors from the Ecoinvent database. Where this was not possible, a spend-based approach was applied. In these cases, data were derived either from purchase orders or general income statements and matched with emission factors from the Exiobase database. The share of activity-based versus spend-based data is 15% and 85% respectively.

Scope 3.2: Capital Goods
– To assess emissions from capital goods, the fixed asset register provided by the accounting department was used and linked to spend-based emission factors from the Exiobase database. This changed compared to the previous year where US EPA was used as data base.

Scope 3.3 : Fuel- and energy-related activities
– The activity data used are identical to the energy data collected under Scopes 1 and 2 and were linked to corresponding emission factors provided by our sustainability consultancy.

Scope 3.4: Upstream transportation
– At DT Swiss, Scope 3.4 includes both the transportation of purchased goods from suppliers to DT Swiss and intercompany transportation. Transport data includes mode of transportation, weight and distance and was linked to emission factors from the Ecoinvent database.

Scope 3.5: Operational Waste
– For waste generated onsite, a hybrid approach was used to calculate emissions, as subsidiaries differ in terms of data accuracy. Where supplier-specific information on waste weights and treatment methods was available, this data was used and linked to emission factors from the Ecoinvent database. Recycling shares and rates were accounted for with zero emissions in the respective factors. Where such data was not available, the average data method was applied, using Ecoinvent emission factors for various waste treatment scenarios and methods.

Scope 3.6: Business Travels
– This category includes business travel by air, rail, and rental cars/taxis. For flights, publicly available $CO_2$ calculators for air travel were used taking into account flight class and stopovers. For rail, rental cars, and taxis, ticket or rental prices were converted into km driven and linked to emission factors from Mobitool for Europe or Ecoinvent for the rest of the world. Where this was not possible, emissions were calculated using spend-based emission factors from US EPA.

Scope 3.7: Employee Commuting
– Employee-specific information on commuting distances and modes of transport was collected through surveys. This data was then extrapolated based on employee numbers provided by the HR department and linked to emission factors provided by our sustainability consultancy.

Scope 3.8: Upstream leased assets
– DT Swiss does not lease its assets for third-party operational control.

E 1 – 6

# EMISSIONS DATA
# DT SWISS GROUP **SCOPE 3**

Scope 3.9: Downstream Transportation
– At DT Swiss, this category represents transportation to OEM and ASM customers. As in Scope 3.4, transport data includes mode of transportation, weight, and distance, and was linked to emission factors from the Ecoinvent database.

Scope 3.10: Processing of sold products
– DT Swiss sells finished products; therefore, further processing steps are not necessarily required.

Scope 3.11: Use of sold products
– DT Swiss products do not consume energy during use, which is why this scope does not apply.

Scope 3.12: End-of-life treatment of sold products
– To calculate the emissions associated with the end-of-life treatment of DT Swiss products, assumptions must be made. The basis for this analysis is the sales data of DT Swiss components, provided by the internal Controlling department. Components and packaging materials are categorized according to their primary material type and corresponding emission factors from the Ecoinvent database are applied, using average disposal scenarios (landfilling, incineration, recycling). Since DT Swiss cannot definitively determine the final destination of its sold components, the analysis does not rely on specific countries and their prevailing disposal practices. Instead, average scenarios at the continental level are used to estimate end-of-life treatment emissions.

Scope 3.13: Downstream leased assets
– DT Swiss does not lease any downstream assets.

Scope 3.14:
– DT Swiss does not operate any franchise businesses.

Scope 3.15:
– DT Swiss does not hold any major investments in other companies.

| CATEGORIES INCLUDED | t $CO_2e$ | TREND[1] |
|---|---|---|
| **SCOPE 3** | 42272.42 | (-16%) |
| PURCHASED GOODS AND SERVICES | 32858.76 | (-21%) |
| CAPITAL GOODS[2] | 3710.74 | (+105%) |
| FUEL AND ENERGY RELATED ACTIVITIES | 1119.14 | (+3%) |
| UPSTREAM TRANSPORT | 1882.82 | (-31%) |
| OPERATIONS WASTE | 165.37 | (-30%) |
| BUSINESS TRAVEL | 472.19 | (-11%) |
| EMPLOYEE COMMUTING | 1598.75 | (+16%) |
| DOWNSTREAM TRANSPORT | 261.65 | (-33%) |
| END-OF-LIFE TREATMENT | 192.48 | (+60%) |

[1]Comparison to the previous year

DT SWISS

E1–6

# EMISSIONS DATA
## DT SWISS GROUP
## TOTAL

**1016** **t $CO_2e$ DT SWISS GROUP**
Scope 1

**3116** **t $CO_2e$ DT SWISS GROUP**
Scope 2

**42272** **t $CO_2e$ DT SWISS GROUP**
Scope 3

**38** t $CO_2e$
**PER DT SWISS EMPLOYEE**

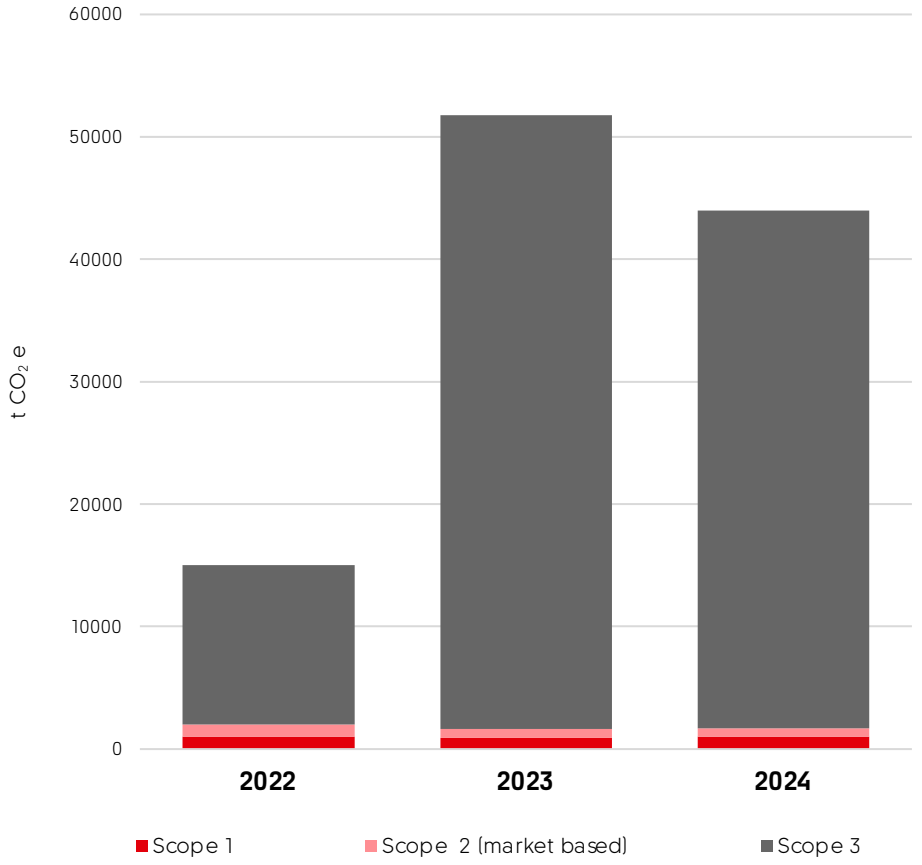
In total, 91% of emissions fall under Scope 3. Within this scope, 78% can be attributed to purchased goods and services. The emissions recorded are mainly caused by the purchase of two main materials: carbon fiber and aluminum. These materials and the associated production processes account for around 65% for all purchased goods and services in 2024.

E 1 – 6

# EMISSIONS DATA
## DT SWISS GROUP **TOTAL**

| CATEGORIES INCLUDED IN THE MEASUREMENT | 2023 t $CO_2e$ | 2024 t $CO_2e$ | TREND[1] |
|---|---|---|---|
| **SCOPE 1** | **917.26** | **1016.01** | **(+11%)** |
| STATIONARY COMBUSTION | 673.54 | 721.45 | (+ 7%) |
| MOBILE COMBUSTION | 242.77 | 283.64 | (+17%) |
| PROCESS OR FUGITIVE EMISSIONS | 0.95 | 10.52 | (+3499%) |
| **SCOPE 2** | | | |
| LOCATION BASED | **3002.75** | **3115.96** | **(+4%)** |
| MARKET BASED | **702.1** | **700.02** | **(-0.3%)** |
| **SCOPE 3** | **50145.68**[2] | **42272.42** | **(-15%)** |
| PURCHASED GOODS AND SERVICES | 41 851.90[2] | 32858.76 | (-21%) |
| CAPITAL GOODS[2] | 1806.03 | 3710.74 | (+105%) |
| FUEL AND ENERGY RELATED ACTIVITIES | 1088.87 | 1119.14 | (+3%) |
| UPSTREAM TRANSPORT | 2744.47 | 1882.82 | (-31%) |
| OPERATIONS WASTE | 234.83 | 165.37 | (-29%) |
| BUSINESS TRAVEL | 534.66 | 472.19 | (-11%) |
| EMPLOYEE COMMUTING | 1373.38 | 1609.28 | (+17%) |
| DOWNSTREAM TRANSPORT | 391.10 | 261.65 | (-33%) |
| END-OF-LIFE TREATMENT | 120.44 | 192.48 | (+60%) |

[1] Comparison to the previous year
[2] See restatement under general disclosures. Due to a change in the emission factor, emissions have reduced significantly, making a restatement necessary.



E 1 – 6

# **EMISSIONS DATA** PER SUBSIDIARY

| **CATEGORIES INCLUDED IN THE MEASUREMENT** | DT SWISS **SWITZERLAND** t $CO_2e$ | DT SWISS **GERMANY** t CO2e | DT SWISS **POLAND** t $CO_2e$ | DT SWISS **TAIWAN** t $CO_2e$ | DT SWISS **FRANCE** t $CO_2e$ | DT SWISS **UNITED STATES** t $CO_2e$ | TRICKSTUFF **GERMANY** t $CO_2e$ |
|---|---|---|---|---|---|---|---|
| **SCOPE 1** | **56.59** | **51.91** | **660.96** | **61.77** | **80.97** | **92.53** | **11.27** |
| STATIONARY COMBUSTION | 0.21 | 4.02 | 634.69 | - | - | 77.59 | 4.94 |
| MOBILE COMBUSTION | 56.09 | 47.90 | 15.87 | 61.77 | 80.97 | 14.71 | 6.33 |
| PROCESS AND / OR FUGITIVE EMISSIONS | 0.29 | - | 10.39 | - | - | 0.23 | - |
| **SCOPE 2** | | | | | | | |
| LOCATION BASED | **1.45** | **7.79** | **2443.29** | **597.27** | **3.00** | **58.38** | **4.77** |
| MARKET BASED | **0** | **0** | **41.36** | **597.27** | **3.00** | **58.38** | **0** |
| **SCOPE 3** | **8220.63** | **260.60** | **19430.78** | **13399.72** | **217.83** | **510.36** | **231.95** |
| PURCHASED GOODS AND SERVICES | **5563.56** | 28.10 | 14532.97 | 12307.12 | 66.67 | 166.04 | 193.74 |
| CAPITAL GOODS | 1686.59 | 84.09 | 1860.47 | 42.27 | 0.00 | 33.62 | 3.70 |
| FUEL AND ENERGY RELATED ACTIVITIES | 41.27 | 18.52 | 790.16 | 188.84 | 26.95 | 44.92 | 8.47 |
| UPSTREAM TRANSPORTATION | 112.65 | 1 | 1140.52 | 452.79 | 47.39 | 126.87 | 1.59 |
| OPERATIONS WASTE | 131.26 | 1.60 | 21.43 | 4.01 | 0.44 | 6.03 | 0.61 |
| BUSINESS TRAVEL | 226.97 | 18.20 | 7.61 | 174.73 | 11.99 | 32.68 | - |
| EMPLOYEE COMMUTING | 324.19 | 108.53 | 891.28 | 146.45 | 45.08 | 75.27 | 18.49 |
| DOWNSTREAM TRANSPORTATION | 29.83 | 0.08 | 1140.52 | 19.91 | 7.80 | 16.55 | 2.22 |
| END-OF-LIFE TREATMENT | 104.31 | 0.48 | 1.10 | 63.60 | 11.49 | 8.37 | 3.14 |
| **TOTAL BIOGENIC EMISSIONS IN t $CO_2e$** | 69.12[1] | | | | | | |

[1]Biogenic $CO_2$ emissions from heating with biogas and organic waste in operations.

DT SWISS

# 5

# RESOURCE USE AND CIRCULAR ECONOMY

# **RESOURCE USE** AND **CIRCULAR ECONOMY**

DT SWISS

# 5.1

# GENERAL INFORMATION

ESRS 2, SBM-3, IRO-1, E 5

# OUR **PRODUCTS**

With high-performance cycling components, DT Swiss aims to push technological boundaries to help ambitious cyclists achieve their personal goals.
Manufacturing these components requires a global value chain that extends from raw material extraction, product design, production, and supportive processes to logistics, after-sales support, and other stages within the product life cycle. Each individual step has a significant impact on the company's success.

As identified in the double materiality analysis, a global value chain influences the environment and society. In the assessment in 2024/2025 DT Swiss identified three material negative impacts, one positive impact and one opportunity:

Negative impacts:
- There are dependencies on a geographically concentrated supply chain for certain parts of DT Swiss products, over which the influence is limited. Restricted material availability, low recycling rates, and long transport routes with high packaging intensity can slow down progress in the transition towards a circular economy.
- Some DT Swiss products contain primary materials with limited capacity for recycling.
- The highly dynamic and fast-paced bicycle industry poses a challenge for DT Swiss as a supplier and brand when it comes to production planning, as some products that are still functional have to be discarded because they are outdated, which increases waste volumes.

Positive impact
- DT Swiss has been known in the industry since its management buyout in 1994 for its commitment to product durability. With reliable products that feature a modular design for easy maintenance, coupled with an extensive spare parts concept and worldwide service centers, DT Swiss is trying to extend the product lifespans in order to implement circular design principles and reduce waste through reuse.

Opportunity:
- Advancing the use of sustainable materials and circular design principles in product development offers a competitive advantage, enabling innovation, regulatory alignment, and long-term value creation

One general consideration in the area of resource use and circular design principles is the fact that circular economy and resource management cannot be addressed alone. It is time for the entire industry to rethink the way products are developed.

The EU's circular economy model enables economic players to make their contribution to climate protection in the areas of production and consumption and thus provides precisely the impetus for society to rethink and transform the way it does business.
The idea is to take the principles already into account when products are designed, to extend the life cycle of products through reuse, repairability and recycling, and to reduce waste to a minimum. The materials used should remain in the cycle to ensure continued value creation in the entire economic environment[1].
Based on this model of the European Parliament's research service, the idea was transferred to DT Swiss. With the help of this model, DT Swiss is illustrating levers, key actions and initial steps already taken towards a more responsible business model in the product development process for components. It is still the very beginning of the journey but nevertheless, the summary shows, where measures and projects have already been implemented or planned.

[1]https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1583933814386&uri=COM:2020:98:FIN

# OUR **PRODUCTS**

**1** **(RAW) MATERIALS**
DT Swiss's most important product materials and their positive and negative impacts.

**2** **RELIABLE DESIGN**
DT Swiss products are built to last and can be used for decades. This includes a reliable design that meets our high quality requirements.

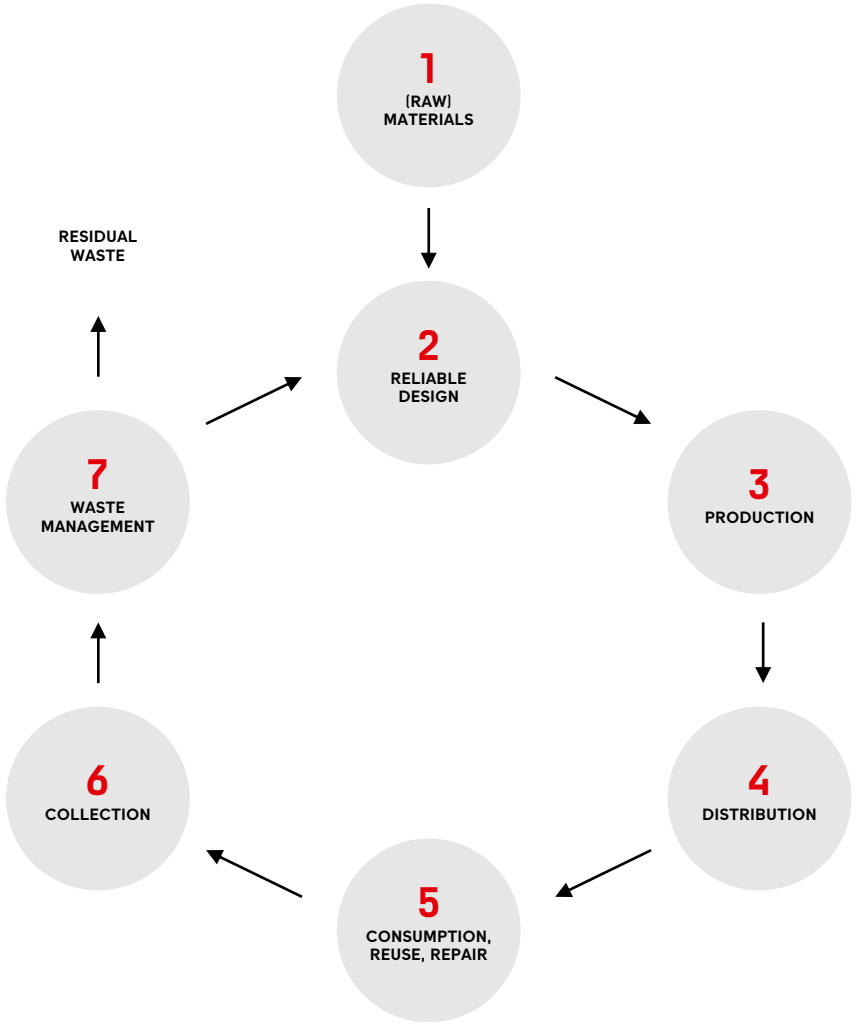
**3** **PRODUCTION**
This chapter provides insights into some specific production processes and general day-to-day operational tasks to best meet the DT Swiss standard of Engineering Excellence.

**4** **DISTRIBUTION**
A description of what actions can be taken to tackle packaging and transportation challenges.

**5** **CONSUMPTION, REUSE, REPAIR**
A USP of DT Swiss: Reliable products, designed for easy maintenance and with an extensive spare parts concepts. The chapter describes, how DT Swiss aims to maximize the usage phase of components with after sales efforts.

**6** **COLLECTION**
The collection section resents a project in carbon end-of-life with all challenges that appear along the way.

**7** **WASTE MANAGEMENT**
Waste streams are analyzed and levers discussed.




Own illustration based on the circular economy model from the European Parliament Research Service

DT SWISS

# 5.2

# LEVERS AND KEY ACTIONS

E 5-4

# (RAW) MATERIALS

1
(RAW)
MATERIALS

As a manufacturing company, material management and the responsible use of raw materials are critical to long-term success. Through in-house production capabilities and a build-to-order approach, it is possible to respond quickly to customer requirements while maintaining oversight of the resources and raw materials used in each product.
Since the management buyout in 1994, growing business operations have led to an increased demand for materials—particularly high-quality materials essential for the development of high-performance products.
Among the most relevant materials are aluminum and carbon fiber due to their strength, durability, and lightweight properties.
Interestingly, when measured by volume, one of the most sourced materials is cardboard, primarily used for product packaging. This insight has prompted a stronger focus on sustainable packaging solutions to reduce environmental impact and support DT Swiss's broader sustainability objectives. Details on packaging are explained in the distribution section.




E 5-2, E 5-4

# ALUMINUM

Aluminum is one of the main elements in rims, hubs and wheelsets. Due to the properties of the material and existing "low impact" aluminum solutions in the market, aluminum is a key element for responsible DT Swiss products.

In 2024, efforts with suppliers were initiated to increase transparency within the aluminum value chain. The objective is to identify potential negative impacts and risks that may arise along the upper value chain, and to determine the proportion of recycled content already present in DT Swiss products.
This initiative aims to move beyond calculating emissions from purchased goods and services based solely on quantities and emission factors from secondary databases. Instead, supplier-specific data is being gradually integrated into the assessment process. It is already known that a significant share of recycled material is used within the European supply chain. However, this is not yet reflected in current calculations due to the absence of official documentation.

Without a solid data foundation, it remains challenging to define clear targets and develop effective reduction action plans for Scope 3 emissions. Once data collection is complete, DT Swiss will determine how to address the topic in a professional and structured manner.

In 2024, small-scale projects for customized wheels were already implemented, enabling OEM customers to source low-impact aluminum from a selected supplier. This purchased, low impact aluminum is then processed into finished products at DT Swiss production facilities.

DT SWISS

E 5-2, E 5-4

# CARBON FIBER REINFORCED POLYMER

At the moment CFRP is irreplaceable for DT Swiss. Due to its material properties, the product characteristics, and the demand from the market, there is currently no alternative.

However, the negative impact of the raw material on the environment is well known. As described in the DMA, carbon is difficult to recycle and mainly primary material is used to manufacture carbon components at DT Swiss.

With the in-house carbon production facility in Oborniki, Poland, it is possible to exert greater control and influence over manufacturing processes and energy generation. At the same time, European production saves transportation costs and therefore positively influences our emissions measurements. It also enables us to better monitor occupational safety guidelines in production and discover optimization potential. For example, we can currently use the heat from the carbon presses to produce hot water. The heat from the air compressors is used to heat some of our premises in Oborniki.

Given the environmental challenges associated with the further treatment of this material due to its limited recyclability, solutions must be sought that can at least reduce the negative impact in this part of the material's life cycle. Further details on can be found in the collection section.

E 5-2, E 5-5

# RELIABLE DESIGN

2
RELIABLE DESIGN

Requirements for reliable product design are considered from the early stages of product development. In this context, reliability means that cyclists can depend on DT Swiss products when achieving their goals. The interpretation of reliability varies depending on the application. In professional downhill racing, reliability is associated with the confidence that products will bring riders safely to the finish line under even the highest stress. For other cyclists, reliability means being able to rely on DT Swiss products to last and be ready for use day in and day out, no matter what adventure they're on.  Regardless of how reliability is understood, the objective is to develop products with a long service life, optimized for their intended use.

As identified in the DMA, DT Swiss is known within the industry for developing products that can be used for decades. During the design phase, components are engineered to ensure compatibility between new spare parts and previous product models. Additionally, spare parts are developed to be compatible across multiple product lines, which contributes to extending product lifespan. This approach allows users to integrate older components with newer bicycle standards, reducing the need for complete product replacements. Furthermore, DT Swiss provides spare parts for a minimum of five years following the end of a product's life cycle.

DT SWISS

E 5-2

# METICULOUS **TESTING**

The long-term experience in bicycle component manufacturing has been a key factor in establishing the current market position of DT Swiss. In-depth industry knowledge enables the company to understand customer needs and translate them into product solutions. With decades of meticulous development and testing, tolerances that are much stricter than official standards, such as ISO 4210 are ensured, as they are an absolute minimum criteria at DT Swiss.

Based on extensive laboratory testing as well as in-field measurements, own test methods and acceptance criteria are designed and developed and continuously refined. DT Swiss products are therefore extensively examined before they leave the premises. Testing is conducted internally in the Performance Test Center at the DT Swiss Headquarters in Biel. With the increasing variety of products, the testing possibilities and thus the entire area of testing have also grown. In the test lab, mechanical load tests are performed on individual wheel and suspension components, as well as on assemblies and complete products.

A wide range of different test formats is currently available, with the majority of testing facilities developed in-house. By collecting field data and replicating load conditions in a controlled environment, laboratory testing enables the continuous acquisition of information to optimize product reliability and performance.

In addition to all of the laboratory tests described above, field tests with various test riders, such as professional cyclists, bike couriers, employees, and everyday riders are another important part in DT Swiss's product development cycle.

3
PRODUCTION

# PRODUCTION PROCESSES

*DT Swiss constantly reinvents smart production and business solutions that tackle the challenges of tomorrow.*

With the functional strategy of Engineering Excellence, DT Swiss believes in smart standardization that conceptualizes processes in an integrative, structured, consistent and comprehensive way and seamlessly integrates digital and physical flows in holistically structured business processes. As a global company, all business activities have been carried out from the start on the premise of a sparing use of resources. Nevertheless, it is clear that the dependency on external resources can negatively impact existing ecosystems.




E 5-2

# PRODUCTION **PROCESSES**

### HAND-BUILDING

Every wheel from DT Swiss is built by hand. Currently, wheel building machines are simply not able to build a wheel of the same quality as those hand-built by a skilled wheelbuilder, following strictly defined processes. This is because many factors come into play while truing a wheel that can vary from wheel model to wheel model. People learn these differences over many years and can differentiate and act accordingly. DT Swiss wheels are destressed several times per side during the wheel building process, until the changes in lateral and vertical deviations and spoke tension are within the tightly defined tolerances. These meticulous process steps and uncompromising tolerances cannot be handled by machines in an economically viable way without compromising on quality – and this is not in line with our demand for Engineering Performance and Excellence.

### INTERNAL QUALITY MANAGEMENT

The quality policy, mainly focused on customer satisfaction, serves as the foundation for defining all quality objectives. These objectives are pursued through the expertise and engagement of employees, targeted internal and external training programs, the application of advanced measurement and testing technologies, and ongoing efforts to improve both effectiveness and efficiency.
Comprehensive quality controls are conducted during incoming inspections and production processes so that the basis to produce high-performance bicycle components is always granted.

E 5-2

# CASE STUDY: **OPTIMIZED PRODUCTION PROCESSES IN POLAND**

To support the strategic objective of preparing for future challenges through smart production practices, an energy consumption analysis was conducted last year at the production site in Poland.

As a result, the operating pressure of production machinery was gradually and systematically reduced, with close monitoring of its impact on all production processes. This adjustment led to a total pressure reduction of 1.6 bar, resulting in energy savings of approximately 10–12%, as lower operating pressure directly decreases the energy demand of air compressors.

This measure has proven to be an effective lever for enhancing resource efficiency in production and supporting the implementation of defined environmental goals such as the reduction of absolute Scope 1 and 2 emissions, as outlined in the Climate Change chapter.

In addition to reduced energy consumption, lower pressure contributes to decreased wear on compressors, hoses, and pneumatic tools, thereby extending their service life. Furthermore, reduced pressure minimizes volumetric air leakage, leading to lower operating costs.

4
DISTRIBUTION

# DISTRIBUTION

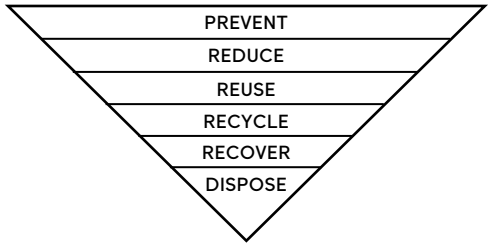
Following production, the next phase involves preparing and distributing the products. As part of the corporate strategy to manufacture as close as possible to the target sales markets, transportation routes are kept as short as possible.

As in the previous year, data on transport routes between suppliers and DT Swiss, intercompany shipments, and deliveries to direct customers were analyzed. There is potential for optimization, particularly concerning transport between suppliers and DT Swiss. This applies both to the mode of transport—such as the use of air freight—and to the frequency of shipments between locations.


E 5-2

# PACKAGING

In terms of weight, cardboard accounted for the largest share of purchased materials in 2024. Cardboard is mainly used for product and transport packaging. Given that packaging is a highly relevant topic in terms of product safety, a packaging specialist was hired in 2024 to strategically develop and organize this field of action. In addition to operational responsibilities, a packaging strategy was introduced, built on six pillars—one of which is the waste hierarchy.




Incorporating the waste hierarchy into the packaging strategy ensures that important questions about the necessity of packaging, as well as the size and material composition of packaging, are addressed early in the packaging development process.
One project that combines packaging and waste management is the development of reusable packaging concepts. In 2024, further efforts were made to develop reusable packaging solutions for OEM customers in Europe. While a reusable wheel packaging solution has already been initiated by DT Swiss Asia for Taiwan, the European solution is being developed through DT Swiss Poland. This solution is currently in the pilot phase and should be tested, refined, and finalized in collaboration with selected customers.
In addition to reusable packaging, plastic-free packaging is another key objective. Although a complete phase-out of plastic is not yet feasible, smaller initiatives—such as plastic-free packaging for remote levers or gravel packaging adapters—have already been successfully implemented.

# CONSUMPTION, REUSE, REPAIR

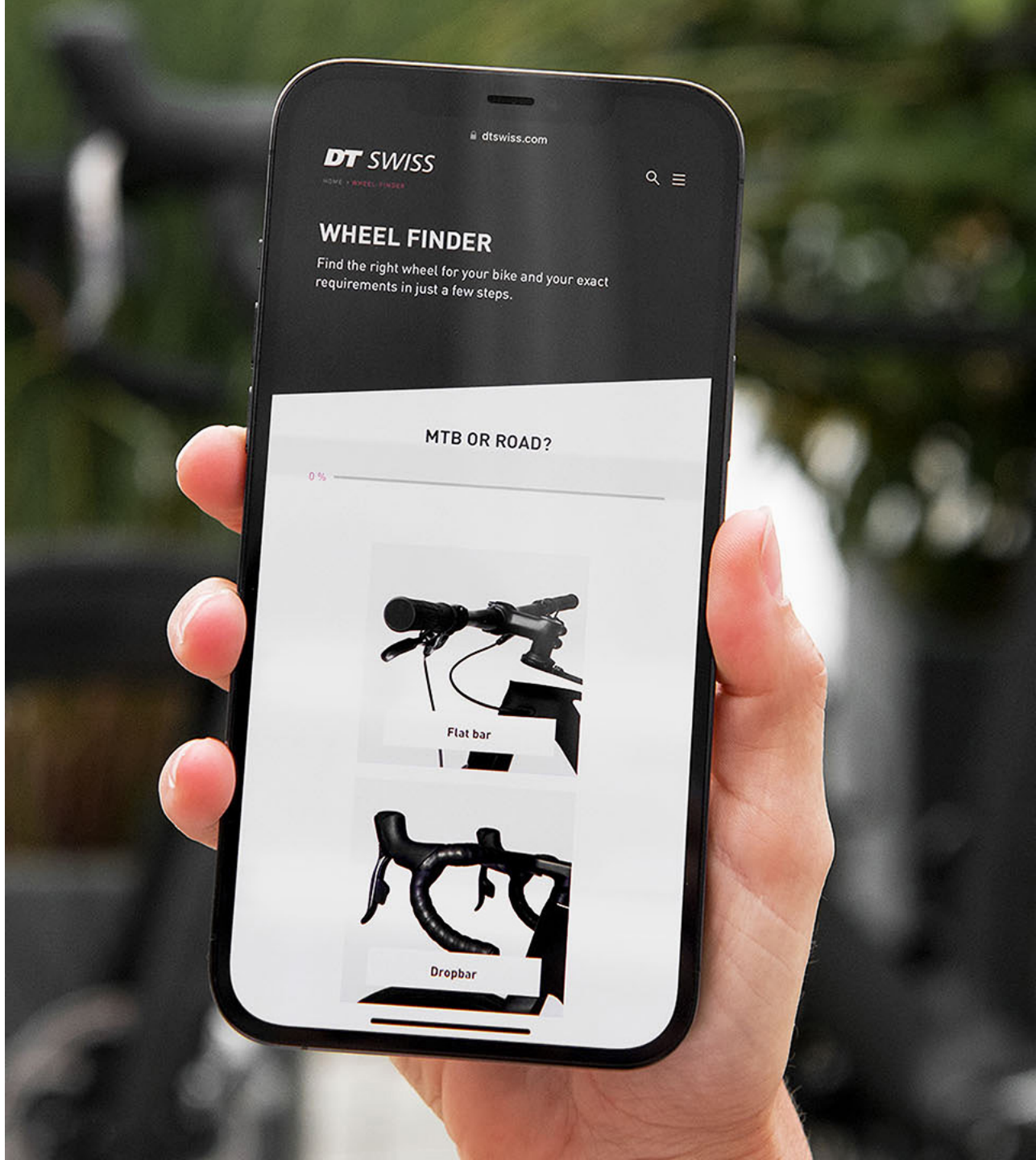
5
CONSUMPTION, REUSE, REPAIR

DT Swiss products are designed to deliver reliable performance throughout their entire life cycle. During the usage phase, customer support is available to assist with inquiries, repairs, and warranty services. These efforts aim to ensure that the products remain functional and in use for as long as possible.

E 5-2

# PRODUCT SUPPORT AND DT SWISS ID

Bicycles and their components are commodities subject to wear and tear. In order to maximize the period of use, DT Swiss provides endconsumers with access to a range of support resources including manuals, instructional videos, spare part lists, and conversion options. These materials are available through the DT Swiss website or by using the DT Swiss ID, ensuring that users can easily find the information needed for maintenance or upgrades. This ID makes it possible to trace the product back to the production batch, which provides additional information in an easy and efficient way. In addition, the ID for our wheels contains a "fingerprint" which includes information about the tension of each spoke, the centricity, the concentricity of the wheel and the name of the respective wheelbuilder. All information is stored in the internal database before a product is made ready for transportation.




E 5-2

# SERVICE CENTER

DT Swiss Service Centers play a key role in the after-sales service offering and significantly contribute to extending product lifespan. A total of 38 active Service Centers worldwide handle repairs, warranty claims, and serve as collection points for used metal and carbon components from DT Swiss, which are properly disposed of or recycled. Since 2024, an updated recycling appendix in the Service Agreement has required all partners to follow clearly defined guidelines for managing end-of-life parts.

The network is complemented by 117 certified Service Points located across core markets. These Service Points operate according to defined standards and ensure access to original spare parts. Global service quality is maintained through standardized processes, annual training sessions, and a structured certification program for new partners.

To support continuous improvement, a customer survey has been included with every repaired product since 2024—across all 38 Service Centers worldwide. This ensures that customer feedback is systematically collected and used to optimize service processes and the overall customer experience.

# COLLECTION

6
COLLECTION

With the launch of the CFRP Re-/Downcycling Program, DT Swiss has committed to actively contributing to the responsible treatment of carbon fiber materials. As of January 1, 2024, all DT Swiss Service Centers are required to collect and properly re-/downcycle CFRP rims that have reached the end of their service life. This applies to all CFRP wheels replaced through repairs, crash replacements, warranty claims, or goodwill cases handled by the Service Centers.



E 5-2

# CARBON RIMS – COLLECTION INITIATIVE

One of the main challenges in CFRP recycling lies in the complexity of the downcycling process, which is currently handled by only a limited number of specialized companies. Additionally, long-distance and cross-border transport of CFRP waste is only efficient once sufficient material has been accumulated.

While the primary goal remains the development of long-lasting products that reach end-of-life only after many years of use, this initiative reflects DT Swiss's commitment to taking responsibility for its carbon waste. The program aims to collect end-of-life CFRP rims globally and integrate them into a structured re / downcycling process.
To support participation, service partners receive a financial incentive for each rim collected.

As downcycling remains cost-intensive and does not yet represent a fully adequate solution from an environmental perspective, DT Swiss has taken the initiative to raise awareness of the issue within the cycling industry. The goal is to explore the potential for developing industry-wide solutions. The topic will be presented for the first time at an event organized by Shift Cycling Culture. Any progress made in this area will be reported in the next publication.

# WASTE MANAGEMENT

7
WASTE MANAGEMENT

Waste management is a key focus area that requires the combined efforts of all stakeholders to generate positive impacts in both the short and long term. The overarching objective is to avoid waste wherever possible or reduce it to a minimum.

E 5-5

# WASTE MANAGEMENT

As a manufacturing company, waste management represents both a significant responsibility and an ongoing challenge. All subsidiaries adhere to local waste management regulations, and efforts are made across all production processes to minimize waste generation. Beyond environmental considerations, reducing waste also offers economic benefits by improving resource efficiency.

Most in-house waste is generated at our production sites during product manufacturing. Here, waste is generated by input materials that become waste after production, as well as outputs that become waste through storage, assembly, machine operation and retiring products.  Cardboard waste is particularly generated in procurement, purchasing and logistics. Finally, in the downstream value chain, waste is generated by the use of our products.
We do concern ourselves with recycling or reusing waste wherever possible: for example, in Poland, waste generated by products we receive from our suppliers can, in many cases, be used as packaging and for intercompany transportation material. Recycling of materials such as aluminum and cardboard is already implemented and managed by third parties who provide us with relevant data.

To address the negative impact of obsolete yet functional products due to fast moving markets and thus misaligned production planning, a dedicated project team was established. The team's objective is to better align existing inventory with actual demand.
By integrating various data sources—such as forecasts, purchase orders, sales opportunities, expected market developments and historical data—the project aims to incorporate multiple perspectives into the production planning process. This approach enables more accurate forecasting and fosters a shared understanding and transparency across the team.
In addition to improved production planning and thus less waste, this initiative ideally contributes to optimized transportation routes, as material flows can be planned more efficiently and proactively.

DT SWISS

# 5.3

# TARGETS

E 5-3

# RESOURCE USE AND CIRCULAR ECONOMY **TARGETS**

| DEFINED TARGET | CURRENT PROGRESS | NECESSARY ADAPTATIONS | SDG[1] |
|---|---|---|---|
| Implementation of a collection concept for end-of-life CFRP rim downcycling via all Service Centers worldwide by 2025 | Ongoing | No adaptations necessary |  |
| Avoidance of waste and reduction of material quantities in packaging | Ongoing | Needs to be refined in the future |  |
| Consider sustainability dimensions in relevant internal company guidelines by 2026, starting with the product development process | Ongoing | No adaptations necessary |  |

[1]The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.

DT SWISS

# 5.4

# DATA

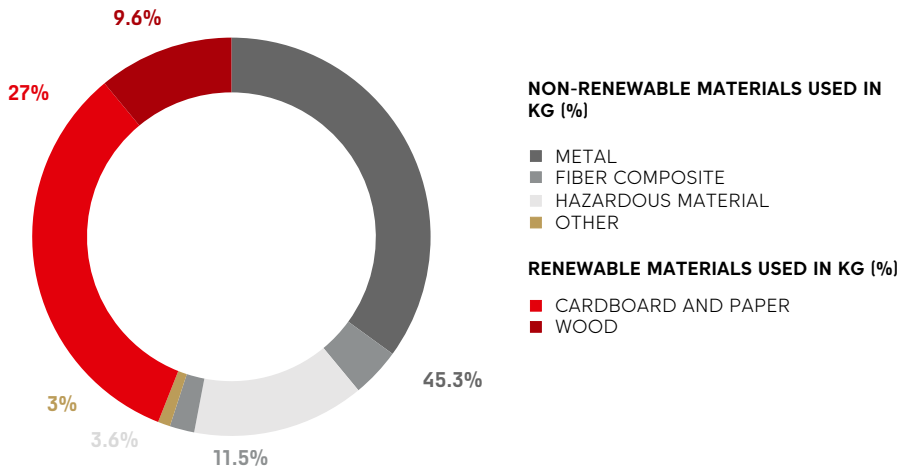
E 5-4

# MATERIALS

The internal ERP system was used to analyze the actual material usage of DT Swiss products. The purchased goods and materials of all subsidiaries and their net weight serve as a basis for the analysis. Like this all materials relevant for product development, transport packaging and process materials are considered. Water and electricity as process material is not taken into account in this analysis.

**1563.60** TOTAL WEIGHT IN METRIC TONS[1]
**NON-RENEWABLE**

**1231.98** TOTAL WEIGHT IN METRIC TONS
**RENEWABLE**

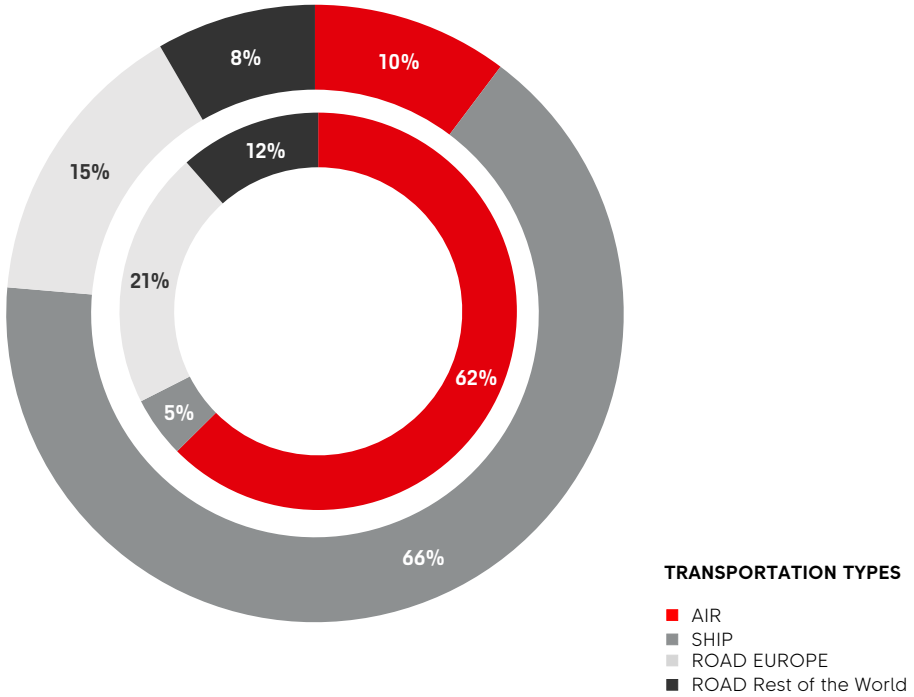



[1]In case of doubt about the correct material type and composition, materials were always classified as non-renewable.

# TRANSPORTATION

The outer circle illustrates the share of transportation routes based on tone-kilometer, the inner circle shows the resulting emissions of the different types of transportation and the associated quantities.

Around 88% of our transport emissions come from upstream or intercompany transportation.



E 5-5

# **WASTE** DATA

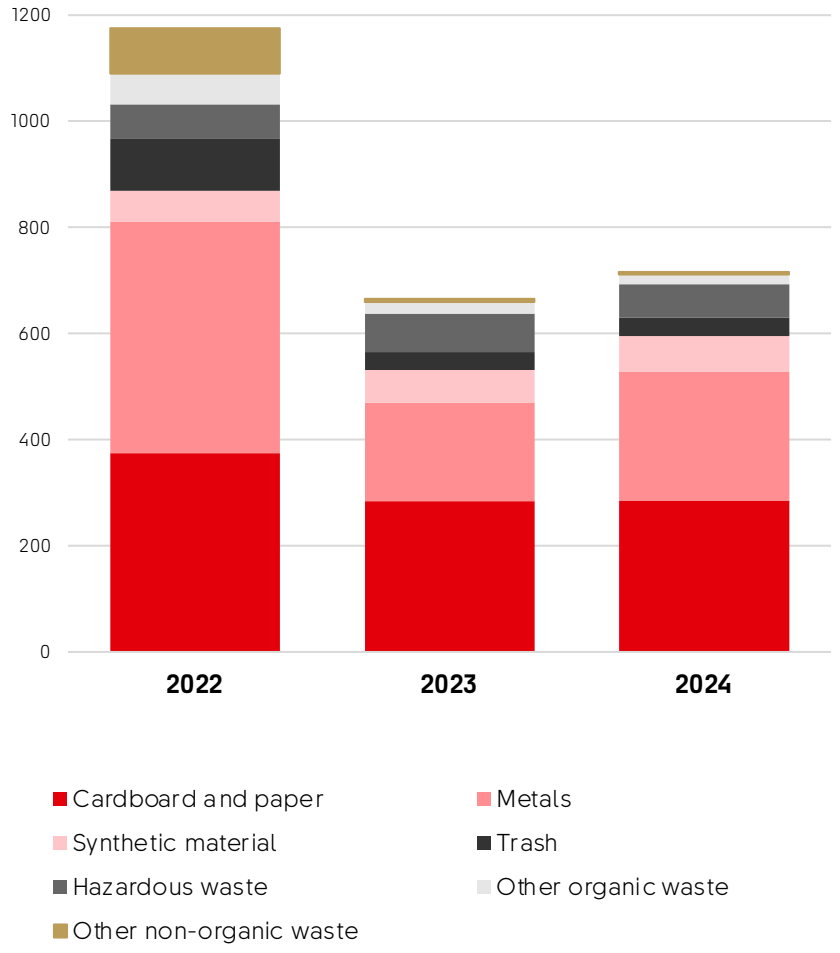
Waste data is received from respective third party providers for our locations in Switzerland and Poland. At our other locations, the data was partly provided by the disposal company and partly estimated by local, internal experts on the basis of the quantities collected and the sizes of the waste containers.

DT Swiss does not further process waste on-site at any DT Swiss subsidiary. All waste that is recycled or prepared for reuse off-site falls under the category "diverted from disposal". Waste that is incinerated with or without energy recovery or that is landfilled is categorized as "directed to disposal".

Compared to the previous year, the amount of waste has risen again, which is attributable to higher production capacity utilization. The proportion of recyclable waste has risen slightly compared to the previous year.

| | UNIT | 2024 |
|---|---|---|
| **TOTAL WASTE GENERATED[1,2]** | **METRIC TON** | **715.33** |
| TOTAL WASTE DIVERTED FROM DISPOSAL[3] | METRIC TON | 564.5 |
| TOTAL WASTE DIRECTED TO DISPOSAL | METRIC TON | 149.6 |
| TOTAL WASTE WITHOUT CLASSIFICATION[4] | METRIC TON | 1.2 |

[1] If data was calculated in m3, the following conversion table was used to calculate the amount in metric tons.
[2] In France, we only have the quantities of cardboard waste. In Taiwan, we lack data on the quantities of synthetic materials.
[3] Around 22 tons of this amount refers to CFRP waste. For the further treatment of this material, DT Swiss receives R3 certificates.
[4] Most of this waste is waiting at our own facilities to be collected and downcycled. As we do not yet know what percentage can be recycled, we did not categorize this amount.



DT SWISS

# 6

# OWN WORKFORCE

# OWN WORKFORCE

DT SWISS

# 6.1

# GENERAL INFORMATION

# THE **DT SWISS SPIRIT**

Employees are a key element to a company's success. Their outstanding performance and motivation provide the decisive advantage in a dynamic and sporty working environment.

ESRS 2, SBM-3, S 1, S 1-1, S 1-2

# THE **DT SWISS SPIRIT**

DT Swiss is an international company in the bicycle industry, with cooperation at eye level and a respectful business casual culture. In addition to a high level of enthusiasm, internal cooperation is characterized by commitment, passion and mutual appreciation. Next to the company culture, DT Swiss complies with all regulations in terms of working conditions and health and safety at all subsidiaries. Moreover, work councils are installed in subsidiaries, where there is a legal obligation to do so.

DT Swiss employees are ambitious, dedicated and motivated to learn. With extraordinary personalities, commitment, and eagerness to learn, extraordinary work results are achieved. The Engineering Personalities strategy aims to ensure that every individual has opportunities for self-development. With internal and external training offers, a broad range of different tools to foster individual strengths and interests is provided.

To guarantee equal conditions for the entire workforce, it is essential to treat every employee equally, regardless of gender, race, culture, religion, age, origin, sexual orientation, disability, or political or other affiliation. The principle of equal opportunity in hiring, promotion, training and development is reflected in the principle: equal work demands equal pay. There is no tolerance for any kind of discrimination against colleagues, customers, suppliers, business partners or other stakeholders. In case of suspicion, the human resources department individually examines each case in detail. If evidence of impropriety is found, sanctions range from disciplinary measures to dismissal.

The health, safety and well-being of employees and partners are a central concern of all business activities and are treated with the same priority as quality, productivity and profitability. Through active cooperation, regular information, and further training we try to foster these principles.

In addition to the globally applicable internal Code of Conduct, there are national employment regulations and policies at all locations that serve as guidelines for the respective workforce. Health and safety guidelines are described in Key Actions and Lever.

In addition to the commitment to uphold the rights of all DT Swiss employees, impacts, risks, and opportunities related to the own workforce are assessed and evaluated as part of the double materiality analysis. In the 2024/2025 assessment, five negative impacts and one financial risk were identified that could affect any DT Swiss employee. All impacts are of individual nature and do not represent a systemic or widespread impact.

- The corporate culture at DT Swiss is characterized by strong commitment and high performance. While this fosters productivity, it can also lead to excessive workloads and extended working hours, which may negatively affect employees' physical and mental health.
- Some employees perceive a lack of transparency regarding internal processes, particularly in relation to compensation structures. This perception can lead to concerns about fairness and equity in remuneration.
- DT Swiss employs a number of workers at or slightly above the minimum wage. With rising living costs, there is a risk that these employees may no longer be able to maintain their standard of living.
- At the same time, strict labor regulations and administrative requirements can reduce operational flexibility. This may result in increased compliance and personnel costs, representing a financial risk for the company.
- The nature of the production environment, which involves a relatively high proportion of manual tasks, can lead to minor injuries and physical strain, particularly due to ergonomically demanding workstations.
- Repetitive tasks at fixed workstations can lead to overuse of specific body parts, increasing the risk of musculoskeletal disorders among production employees.

# **ENGINEERING** PERSONALITIES

DT Swiss professionally assists committed employees in striving for their peak of self-development in order to achieve inspiring, creative and extraordinary work performances.

### **LEARNING** ORIENTED

We encourage our employees to face challenges and to grow with them. We do not see failures as defeats, but as impulses to encourage our employees to learn from them and to dare to try again.

### **PERFORMANCE** ORIENTED

We reward exceptional work results and value the high commitment of our employees. We motivate our employees to fully utilize their capacity in order to ambitiously tackle their professional goals.

### **CUSTOMER** ORIENTED

We have internalized that only motivated and committed employees enable a successful customer centricity. The goals of our internal and external customers define our leadership task and are the most important reference points for the formulation of individual goals for our employees.

### **TEAM** ORIENTED

We see every employee as an important part of the cross-departmental, cross-hierarchical and cross-cultural DT Swiss Team. Everyone has a direct influence on our joint success, the lived corporate culture and the daily working atmosphere. We make our employees aware of this responsibility.



S 1-2

# LATEST **DEVELOPMENTS**

After a year marked by adjustments and structural changes in 2023, 2024 proved to be more stable and consolidated in many respects. The organization was able to focus more strongly on strategic developments, particularly in the area of human resources and organizational development. As part of this process, the management board was expanded to include, among others, the Director of People and Organization. The aim of this adjustment is to bring the voice of employees more into strategic decisions and to find the right approach to empower talent, foster innovation and minimize the loss of knowledge.

Compared to the previous year, an increase in the number of employees was achieved, mainly due to the expansion of capacity in the area of in-house carbon production. As the percentage of female workers in production in Poland is very high, the workforce has become slightly more female compared to the previous year. At management level, the distribution remains unchanged, as does the potential for improvement in this area. Even though the challenges of a more diverse workforce are high due to the relatively homogeneous nature of the bicycle industry, it is the employer's responsibility to define measures that appeal to a wider range of people. With the introduction of a working group on diversity, equality, and inclusion in 2023, the goal was to actively involve people who have an intrinsic motivation for this topic in the development of this issue at DT Swiss. However, due to personnel changes and missing structures, the group was significantly reduced. Thus, it serves now as advisory board for the People and Organization department, which integrates the topic of DEI in their daily decision processes.

A key focus related to our own workforce was the comprehensive planning and implementation of a new job architecture at our headquarters in Switzerland. In addition, an online whistleblower software was introduced and implemented. More details can be found on the next slides.

DT SWISS

# 6.2

# LEVERS AND KEY ACTIONS

S 1-3, S 1-4, S 1–17

# KEY ACTIONS AND LEVERS

## JOB ARCHITECTURE

The revision of the DT Swiss job architecture aims to ensure a future-proof and sustainable personnel structure. In the past, the career path for committed employees was often tied to taking on leadership responsibilities. However, this model increasingly reached its limits – not every talented professional aspires to a leadership role or possesses the necessary competencies for it. The new job architecture has established equivalent development paths that enable both leadership and expert careers.

The goal is to foster individual strengths and offer employees a long-term and transparent perspective within the company – regardless of which path is chosen. This also aims to positively influence the growing challenge of employee retention and to specifically address the concerns of employees, including demands for future planning.

Through newly developed guidelines for year-end and development discussions, the creation of requirement profiles for each job level, and the development of a competency catalog, employees will have transparent insight into available development opportunities and the requirements for each role, enabling them to pursue their next career steps.

The goal is to roll out the new job architecture across the entire corporate group.

## WHISTLEBLOWING AND E-LEARNING

To verify whether the core belief in equal conditions for all employees is truly being upheld, an online whistleblower software was introduced for DT Swiss employees in 2024. Through this third party-provided solution, employees can report grievances within the company at any time and, if desired, anonymously. A clearly defined process regulates how incoming reports are handled in a transparent manner and how the protection of whistleblowers is ensured. This software is available for all employees worldwide except for our subsidiary in the US, where a different approach to report grievances is in place.

During the reporting period, one case was reported via the internal whistleblowing software. The case did not constitute a human rights violation, but was generally classified as workplace misconduct, specifically in the area of harassment and bullying. In accordance with established internal procedures, the case was thoroughly investigated, appropriate measures were taken, and the matter was resolved.

Next to the software introduction, the doors remain always open to both the HR department and the respective supervisor for any communication of critical concerns.

In addition to the implementation of a whistleblowing software, DT Swiss has developed e-learning modules in English, German, Traditional Chinese, Vietnamese, and Polish. These modules are designed to support employees in better understanding the content of the internal Code of Conduct. The aim is to ensure that all employees are aware of their rights, understand the scope of action available to them within the company, and know how to appropriately respond when witnessing misconduct.

DT SWISS

S 1-1, S 1-4, S 1-14

# SAFETY, HEALTH AND WELL-BEING

Occupational health and safety is a top priority at DT Swiss. As a manufacturing company with a high proportion of manual labor, repetitive work processes and monotonous movement patterns can have a negative impact on the workforce. In this context, however, it is important to note that the nature and scope of business activities vary by subsidiary. Sites in France and Germany primarily serve sales and service functions and do not operate their own production facilities. As a result, while health and safety remains a relevant and necessary consideration at these locations, it is not addressed with the same level of operational detail and complexity as at major production sites.

To underline the importance of occupational health and safety, all guidelines are aligned with recognized local standards at all production sites and for all DT Swiss employees. These are reviewed at regular intervals by specially trained internal colleagues or, where not available, through external experts via audits, in order to give the issue the permanent attention it deserves.

In Switzerland, the management system fulfills all requirements of EKAS in an appropriate manner and is internally audited on a regular basis. Moreover, the system is normally checked by external auditors every five years.

At the sales and service subsidiary in Germany, potential hazards are assessed with an online tool from the BGHW. In France, the Medecine du Travail is used as foundation of occupational health and safety. In the USA the instructions of OSHA are adhered to, in Taiwan the instructions of the Taiwan Occupational Safety and Health Act, and in Poland several regulations such as the regulation of Labor Code and the Decree of the Ministry of Family and Social Policy on General Health & Safety Regulations are used. The decentralized organization of the topic can be attributed to the different business activities and location sizes.

The scope of efforts with regards to occupational health and safety systems at all DT Swiss subsidiaries apply to all employees and contracted workers at our facilities from their hiring date.



S 1-4

# SAFETY, HEALTH AND **WELL-BEING**

Next to management systems, risks are minimized with frequent trainings and audits. Safety equipment and manuals are provided and safety officers and first responders were established. Their input helps to constantly further develop, implement and evaluate existing occupational health and safety systems. Our company first aid staff are trained during working hours to provide first aid care and respective documentation. They also ensure that our first aid equipment is stocked. Should an accident occur, an investigation process is defined through a step-by-step action plan.
In case of emergency and unforeseen events, an emergency process describes how employees should behave to remove themselves from a work situation that they believe could cause injury or ill health.

In all subsidiaries, every new employee receives a briefing on occupational safety. Specific training courses, e.g. on fire protection, are held regularly. Where chemical substances are present, the air quality is monitored frequently.
In Poland, all employees undergo regular medical examinations every 3 years. Moreover, a risk analysis and preparation of preventive measures is carried out for each workplace by the respective safety team. To counteract the identified negative impact on overload of certain body parts, prevention techniques to avoid musculoskeletal strain are taught.
In Taiwan there is an additional focus on training with external training opportunities for cardiopulmonary resuscitation and automated external defibrillator. Lectures on office ergonomics, prevention and improvements are held by the local doctor and a comprehensive annual health exam is available for every employee. Moreover, contracted medical professionals provide regular on-site service once a week.

S 1-4

# HEALTHY LIFESTYLE

In addition to mandatory training and education measures regarding health and safety, DT Swiss also wants to actively protect employees and support them in safe and healthy lifestyles.

Depending on the respective subsidiary, DT Swiss offers their employees sports programs in the form of yoga, functional training, spinning or individually organized group bike rides as health promotion services. Some employees are also an integral part of local sporting events such as the MTB Marathon in Oborniki or the KOM in Taiwan. Since 2024, there has also been a monthly vegetarian kitchen day in Switzerland, on which exclusively vegetarian dishes are offered.
Moreover, ergonomic workstations, covid tests, vaccination initiatives and fever measuring stations ensure a healthy working atmosphere.

S 1-4

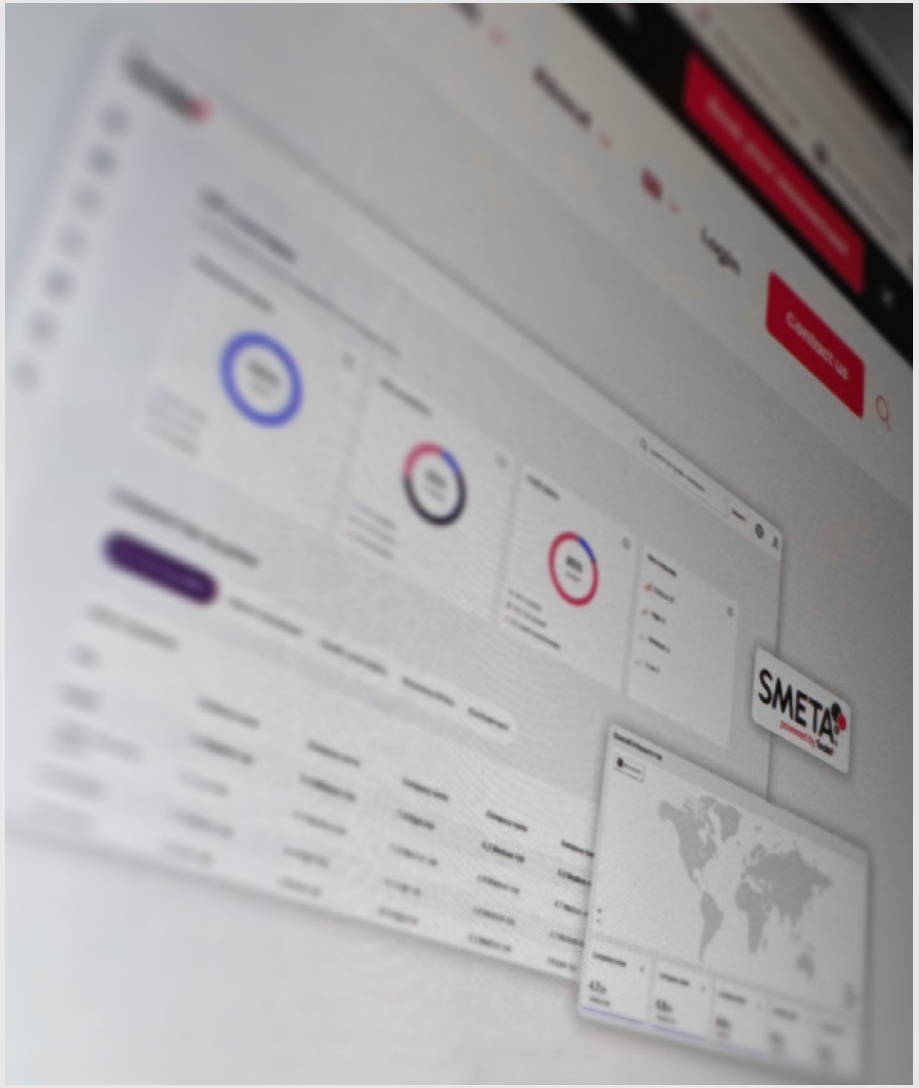
# CASE STUDY: **SMETA 4-PILLAR AUDIT**

In 2024, a first ethical audit was carried out at DT Swiss Asia in accordance with the SMETA 4-Pillar Standard. A SMETA 4-Pillar Audit assesses companies in four areas: labor standards, health and safety, environmental management, and business ethics. The aim is to ensure social and environmental responsibility.

Why did DT Swiss conduct such an audit?

Firstly, while ethical audits are not entirely new, the standards, tools, and expectations surrounding them have evolved significantly in recent years. As a result, many companies are still trying to understand how they measure up against these modern benchmarks. The audit helps to assess DT Swiss's position in a structured and well-founded manner and to gain an external perspective on the business practices carried out at own production sites. At the same time, this proactive approach can also create added value for customers, who can use external audit reports and corrective action plans to meet their due diligence requirements in the supply chain. Audit results can be provided on request.

DT Swiss Polska z. o.o will be audited with the same standard in June 2025.



DT SWISS

# 6.3

# TARGETS

S 1-5

# OWN WORKFORCE **TARGETS**

As outlined in the Key Actions and Levers section on whistleblowing, the objective of implementing the software has been achieved. Due to a tailored solution in the United States, we can confirm that the goal has been met. Public access to the software via the website, as previously described, is planned for 2025.

The target of a 20% reduction in work-related absences at the Swiss site was narrowly missed, although we were able to reduce the number of cases from six in 2023 to five in 2024. Efforts are being made to maintain this level going forward, although due to personnel changes, the responsibility for this topic will need to be redefined at the headquarters. Since we consider this topic particularly relevant for production sites, a Switzerland-specific target is no longer sufficient. Therefore, no new target is being defined. Instead, a joint discussion with the subsidiaries is required to establish shared objectives in the area of health and safety. The reduction target of 20% for non-work-related absences was also not achieved. Although minor initiatives such as awareness campaigns via the intranet, first aid courses, and the introduction of an emergency card were launched, it must be acknowledged that non-work-related accidents fall outside the direct sphere of influence of DT Swiss. For this reason, the target will no longer be pursued.

DT Swiss has taken key steps to develop a needs-oriented training portfolio for employees and managers in the headquarter. Building on the leadership concept, tailored training programs were designed for both groups. In addition, further trainings were developed based on the results of a training needs survey. To better align future training with employee needs, the annual performance and competency reviews will be systematically evaluated at least once a year.

After several years of experimenting with various formats—such as the digital learning platform, e-learnings, and classroom-based soft skills trainings—DT Swiss is now analyzing the outcomes to shape a location-specific Learning & Development concept for the Swiss site.
A group-wide concept is not planned at this stage due to the diverse needs across different locations.
.

| DEFINED TARGETS | CURRENT PROGRESS | NECESSARY ADAPTATIONS | SDG[1] |
|---|---|---|---|
| Implementation of an online whistleblower across all subsidiaries, available to all employees in 2024 | Achieved | No adaptations necessary |  |
| Opening the system to the entire supply chain in 2025 | Ongoing | | |
| -20% of work-related days of absence in 2024 compared to 2023 at DT Swiss headquarters | Goal not achieved | No adaptations necessary |  |
| -20% of non-work-related days of absence in 2024 compared to 2023 at DT Swiss headquarters | Goal not achieved.<br><br>30% Reduction achieved | Will no longer be pursued in the future |  |
| Development of a needs-oriented training portfolio for employees and managers | Ongoing | No adaptations necessary |  |
| Annual review of adequate wages at all DT Swiss locations | New goal | |  |

[1]The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.

DT SWISS

# 6.4

# DATA

ESRS 2, SBM-1, S 1-6

# DT SWISS **OWN WORKFORCE**

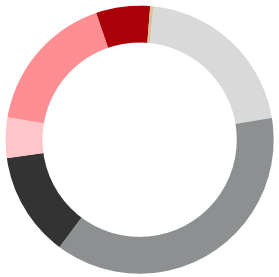
As of December 31, 2024, the DT Swiss Group has 1209 employees. In this context, the term "employee" refers to all DT Swiss Group personnel.
Any deviations from this definition are mentioned in the text or illustrations.
The figures below are the headcount as of December 31, 2024.
The percentages in brackets represent the comparison with the data from the previous year. Rounding errors may occur.
Excluding all employees hired by DT Swiss France, DT Swiss employees are not covered by collective bargaining agreements but of course have the freedom of association.

| | **DT SWISS SWITZERLAND** M / F / NB | **DT SWISS GERMANY** M / F / NB | **DT SWISS POLAND** M / F / NB | **DT SWISS TAIWAN** M / F / NB | **DT SWISS FRANCE** M / F / NB | **DT SWISS UNITED STATES** M / F / NB | **TRICKSTUFF GERMANY** M / F / NB | **TOTAL** |
|---|---|---|---|---|---|---|---|---|
| **Total employees** | 175 / 70 / 1 | 25 / 5 / 0 | 173 / 478 / 0 | 63 / 102 / 0 | 26 / 12 / 0 | 28 / 17 / 0 | 30 / 4 / 0 | **518** (+9%) **/ 690** (+19%) **/ 1** (-50%) |
| **Permanent full-time employees** | 136 / 39 / 0 | 22 / 4 / 0 | 173 / 476 / 0 | 63 / 102 / 0 | 26 / 12 / 0 | 28 / 15 / 0 | 18 / 3 / 0 | **466** (+17%) **/ 651** (+45%) **/ 0** (-100%) |
| **Temporary full-time employees** | 6 / 4 / 0 | - | - | - | - | - | - | **6** (-85%) **/ 4** (-96%) **/ 0** (-) |
| **Permanent part-time employees** | 28 / 27 / 1 | 3 / 1 / 0 | 0 / 2 / 0 | - | - | 0 / 2 / 0 | 11/ 1 / 0 | **42** (+27%) **/ 33** (+18%) **/ 1** (-100%) |
| **Temporary part-time employees** | 3 / 2 / 0 | - | - | - | - | - | 1 / 0 / 0 | **4** (+300%) **/ 2** (+100%) **/ 0** (-) |
| **Non-guaranteed hours employee**[1] | 1 / 1 / 0 | - | - | - | - | - | - | **1** (-67%) **/ 1** (-) **/ 0** (-) |
| **TOTAL AMOUNT OF EMPLOYEES** | **246** (+3%) | **30** (+7%) | **651** (+26%) | **165 (**+1%) | **38** (+9%) | **45** (+10%) | **34** (10%) | **1'209** (+14%) |

[1] Non-guaranteed hours employees are not taken into account under total amount of employees.
Employees who regularly work on the premises but do not have a contract with DT Swiss, such as security personnel, are not included in the calculation, nor are the five employees who work independently as contract workers, consultants, or who have a commission agreement.

S 1-6

# DEMOGRAPHICS BY **SUBSIDIARY, GENDER AND AGE**

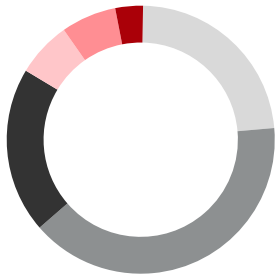


### SWITZERLAND

**MALE (71%)**
- <30 (29%)
- 30–50 (53%)
- 50+ (18%)

**FEMALE (28.6%)**
- <30 (17%)
- 30–50 (60%)
- 50+ (23%)

**NON-BINARY (0.4%)**
- <30 (100%)

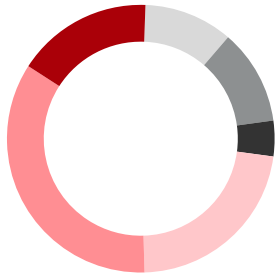


### GERMANY

**MALE (83%)**
- <30 (28%)
- 30–50 (48%)
- 50+ (24%)

**FEMALE (17%)**
- <30 (40%)
- 30–50 (40%)
- 50+ (20%)

**NON-BINARY (0%)**

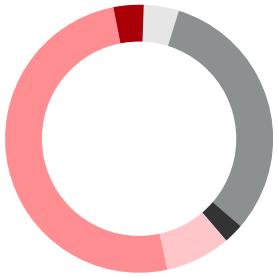


### POLAND

**MALE (27%)**
- <30 (40%)
- 30–50 (43%)
- 50+ (16%)

**FEMALE (73%)**
- <30 (31%)
- 30–50 (47%)
- 50+ (22%)

**NON-BINARY (0%)**

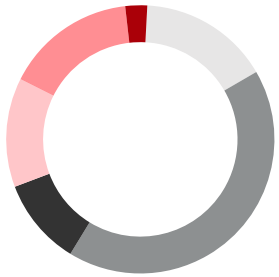


### TAIWAN

**MALE (38%)**
- <30 (11%)
- 30–50 (83%)
- 50+ (6%)

**FEMALE (62%)**
- <30 (13%)
- 30–50 (81%)
- 50+ (6%)

**NON-BINARY (0%)**



### FRANCE

**MALE (68%)**
- <30 (23%)
- 30–50 (62%)
- 50+ (15%)

**FEMALE (32%)**
- <30 (42%)
- 30–50 (50%)
- 50+ (8%)

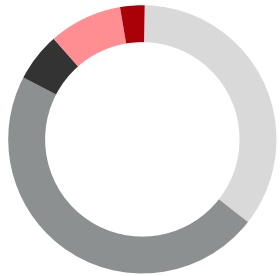
**NON-BINARY (0%)**

### USA

**MALE (62%)**
- <30 (18%)
- 30–50 (69%)
- 50+ (14%)

**FEMALE (38%)**
- 30–50 (47%)
- 50+ (53%)

**NON-BINARY (0%)**



### TRICKSTUFF

**MALE (88%)**
- <30 (40%)
- 30–50 (53%)
- 50+ (6%)

**FEMALE (12%)**
- 30–50 (75%)
- 50+ (25%)

**NON-BINARY (0%)**

With subsidiaries in Germany, Poland, France and Switzerland, one location in the USA and a company in Taiwan, a wide variety of cultures and a total of 22 nationalities come together. With the exception of the location in Taiwan, we rely on local managers in each country. Looking at gender distribution, one can see that in total and especially in our production sites in Poland and Taiwan, more women than men are employed. Most of these women work in our wheel building departments.

S 1-6, S 1-9, S 1-10

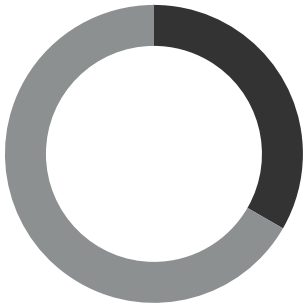
# DATA **OWN WOKRFOCE**

**BOARD OF DIRECTORS (6)[1]**

**MALE (67%)**
- 30–50 (50%)
- 50+ (50%)

**FEMALE (33%)**
- 0–30 (50%)
- 50+ (50%)

**NON-BINARY (0%)**

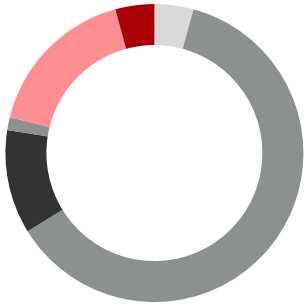


**EXECUTIVE BOARD (6) [2]**

**MALE (100%)**
- 30–50 (33%)
- 50+ (67%)

**FEMALE (0%)**

**NON-BINARY (0%)**

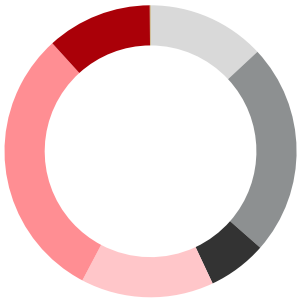


**MANAGEMENT (71)**

**MALE (77%)**
- <30 (5%)
- 30–50 (80%)
- 50+ (15%)

**FEMALE (23%)**
- <30 (6%)
- 30–50 (75%)
- 50+ (19%)

**NON-BINARY (0%)**



**EMPLOYEES (1209)**

**MALE (40.4%)**
- <30 (34%)
- 30–50 (52%)
- 50+ (14%)

**FEMALE (59.6%)**
- <30 (26%)
- 30–50 (53%)
- 50+ (21%)

**NON-BINARY (0.09%)**
- <30 (100%)

[1] Our Board of Directors, which acts as an advisory body, is based in Switzerland and consists of four DT Swiss members, including the two owners, and two people who are not employed by DT Swiss.

[2] The Executive Board is largely based in Switzerland with representation in Taiwan and manages the day-to-day operations.

## HIRES AND TURNOVER

**315** (+616%)[3] TOTAL **HIRES GROUP**

**0.26** TOTAL **HIRES RATE[2]**

**167** (-55%)[4] TOTAL **TURNOVER GROUP**

**0.14** TOTAL **TURNOVER RATE[2]**

## ADEQUATE WAGES

DT Swiss applies a structured decision-making approach to assess and ensure adequate wages across its global workforce. For all locations within the European Union, the statutory minimum wage serves as a reference point to evaluate whether employees receive an adequate income in line with local standards.
For the Taiwan site, DT Swiss conducts an annual assessment inspired by the Anker Methodology. This analysis evaluates whether wages are sufficient to cover employees' basic needs and provide a certain level of discretionary income, thereby ensuring alignment with the principles of a living wage. We are currently developing an internal standardized process for Switzerland and the USA to ensure fair and adequate wages across the entire Group. Our goal is to implement a unified process that complies with local regulations by the end of the first half of 2026.

[3] Comparison with previous year
[4] The rate is calculated as follows: Total number of turnovers/hires, divided by total amount of employees per subsidiary (with reference date: December 31, 2024 and headcount method).

S 1-14

# WORK RELATED INJURIES

| | **DT SWISS** SWITZERLAND | **DT SWISS** GERMANY | **DT SWISS** POLAND | **DT SWISS** TAIWAN | **DT SWISS** FRANCE | **DT SWISS** UNITED STATES | **TRICKSTUFF** GERMANY |
|---|---|---|---|---|---|---|---|
| | AMOUNT/RATE[1] | AMOUNT/RATE[1] | AMOUNT/RATE[1] | AMOUNT/RATE[1] | AMOUNT/RATE[1] | AMOUNT/RATE[1] | AMOUNT/RATE[1] |
| **Fatalities as result of work- related injuries** | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 |
| **High-consequence work-related injuries** | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 | 0 / 0 |
| **Recordable work-related injuries** | 5 / 10.99 | 2 / 37.88 | 7 / 7.2 | 31 / 94.79 | 0 / 0 | 0 / 0 | 1 / 16.71 |
| **Main types of work-related injuries** | Minor cuts on fingers or little foot injuries | Minor cuts on fingers | Minor injuries to the hand, knee or foot. Little cuts. | Traffic accidents on the way to or from work | - | – | Little cuts |
| **Work-related hazards that pose a risk of high-consequence injury** | Handling of chemicals Logistics | Service work | Overloading of certain body parts due to monotony of work processes. Working with aluminum and carbon dust | Commuting | – | – | Logistics |
| **Actions taken or underway to eliminate hazards and work-related injuries** | | | Reconstruction of certain machines, Refresher training on workplace hazards | Provision of traffic safety rules & knowledge | – | | |
| **Numbers of hours worked** | 445368 | 52800 | 971'142 | 327040 | 66234 | 92382 | 59840 |
| **TOTAL DT SWISS GROUP** | | | 22.8 | | | | |

The calculation method of the rate is as follows: Amount of cases divided by the number of hours worked multiplied by 1 million.
All workers who are employees were included in the calculation.

DT SWISS

# 7

# WORKERS IN THE VALUE CHAIN

# WORKERS IN THE VALUE CHAIN

DT SWISS

# 7.1

# GENERAL INFORMATION

ESRS 2, SBM-3, S 2

# GENERAL **INFORMATION**

DT Swiss engages with workers both upstream and downstream in its value chain. Upstream includes labor involved in raw material extraction, processing, and the production of semi-finished goods. Downstream involves workers at OEM and ASM customers as well as logistics partners.
DT Swiss identifies areas mainly in the upstream supply chain where negative impacts on workers occur or may occur.

The group currently identified as most vulnerable are migrant workers in Asia. The most pressing impact affecting this group is the payment of recruitment fees. The issue of fees paid by migrant workers is a major structural problem that cannot be solved by individual companies alone.
The analysis is still at a very early stage and may evolve as transparency and data availability increase.

In addition, further impacts negatively affecting workers in the value chain were identified during the DMA process.

- Long working hours represent both an acute and potential negative impact for workers across the value chain. This is often a systemic issue, not limited to individual suppliers.
- In several countries where parts of the DT Swiss value chain are located, minimum wages are either not established or set at levels that do not allow workers to meet their basic needs thus below an adequate living wage. This impact, too, is considered a systemic problem in respective regions.

These findings are primarily based on exchanges with customers and sustainability expert groups. In addition, DT Swiss gains deeper insights into specific working conditions through its presence in Taiwan, which provides a more direct understanding of local labor practices and challenges.

To address these issues more systematically and professionally, in 2023 DT Swiss began to establish a structured due diligence process across its supply chain. This approach also covers the topic of workers in the value chain. Further details can be found in the section "Due Diligence" under General Disclosures.

One of the key challenges that needs to be tackled in the short and mid-term lies in gradually increasing transparency in the upstream supply chain to better identify and assess risks and negative impacts.

S 2-1

# POLICY

In 2023, DT Swiss introduced a Supplier Code of Conduct to complement the existing Code of Conduct for its own workforce. This document outlines the key principles and practices DT Swiss places on its suppliers. The document is aligned with the United Nations Global Compact guidelines and serves as a basis for responsible business practices. It addresses critical topics such as human rights, labor standards, health and safety, and environmental responsibility. The aim is to promote ethical conduct and ensure that suppliers operate in a manner consistent with DT Swiss's values and sustainability commitments.
The document is distributed to relevant product suppliers who are required to review, sign, and return it as a formal acknowledgment of their commitment to these standards. Through this process, DT Swiss seeks to foster long-term partnerships based on transparency, accountability, and shared responsibility for sustainable development.

However, in its role as a brand and supplier, DT Swiss also acknowledges that individual and customer specific documents are not always efficient when it comes to improvements for workers in the value chain. A standardization of requirements for the value chain within the bicycle industry should be urgently pursued to simplify the administrative work for suppliers, giving them more time for actual improvements and adjustments, if necessary.

DT SWISS

# 7.2

# LEVERS AND KEY ACTIONS

S 2-4

# **LEVERS** AND **KEY ACTIONS**

The challenges identified in relation to workers in the value chain are systemic and structural in nature. Due to limited influence, DT Swiss is reaching its limits in solving these problems independently. Meaningful and lasting improvements often require collective action and collaboration across the industry.
DT Swiss therefore recognizes the importance of engaging in sector-wide initiatives to drive progress on topics such as fair recruitment and safe working conditions. Only through shared responsibility and coordinated efforts can these challenges be effectively addressed.

In 2024, DT Swiss expanded its approach to risk assessment. In addition to assessing country and industry risks, specific supplier-related inquiries were made. These targeted assessments are an important step toward gaining deeper insights into suppliers' working practices and strengthening the company's due diligence processes. 2024 served as a pilot project to find out how suppliers deal with such requests and how much work it takes to compile this information. For this reason, requests have only been made sporadically in the area of aluminum suppliers from Asia. DT Swiss plans to broaden its supplier-specific assessments within the aluminum value chain in 2025, aiming to strengthen transparency and improve risk mitigation efforts.

Moreover, as announced in the 2023 report, DT Swiss will extend its existing whistleblowing tool to include external stakeholders in 2025. This will allow workers in the value chain to anonymously report grievances online via the DT Swiss website.

As part of the Swiss Supply Chain Act (VSoTr), an additional check was carried out to determine whether due diligence and transparency obligations regarding conflict minerals or child labor exist along our value chain.
With regard to conflict minerals, the customs tariff numbers did not identify any articles that fall under the due diligence obligations.
With regard to child labor, as of today, there is no reasonable suspicion of illegal child labor as defined by the associated explanatory report. Due to the vague wording of said report, the internal company documentation further explains the measures taken to appropriately deal with the matter.

DT SWISS

# 7.3

# TARGETS

S 2-5

# WORKERS IN THE VALUE CHAIN **TARGETS**

With regard to the target of internal transparency, 2025 will not be sufficient to achieve the goal, which is why it will be postponed by one year.

Similarly, the previously stated objective of conducting internal audits for all high-risk suppliers by 2026 has been revised. This target has been postponed by one year, with completion now planned for 2027.

DT Swiss remains committed to its target of obtaining signed acknowledgments of the Supplier Code of Conduct from all Tier 1 product suppliers by 2027. This goal reflects the company's ongoing efforts to promote responsible business practices and ensure alignment with its sustainability standards.

| DEFINED TARGETS | CURRENT PROGRESS | NECESSARY ADAPTATIONS | SDG[1] |
|---|---|---|---|
| Internal transparency of Tier 1 and 2 product suppliers by 2025 | Ongoing | Postponed to 2026 |  |
| 80% signed Code of Conduct documents from all Tier 1 product suppliers by 2027 | Ongoing | No adaptations necessary |  |
| Internal audits of all high-risk Tier 1 suppliers by 2026 | Ongoing | Postponed to 2027 |  |

[1]The content of this publication has not been approved by the United Nations and does not reflect the views of the United Nations or its officials or Member States.

DT SWISS

# 8

# CYBERSECURITY

# CYBERSECURITY

DT SWISS

# 8.1

# GENERAL INFORMATION

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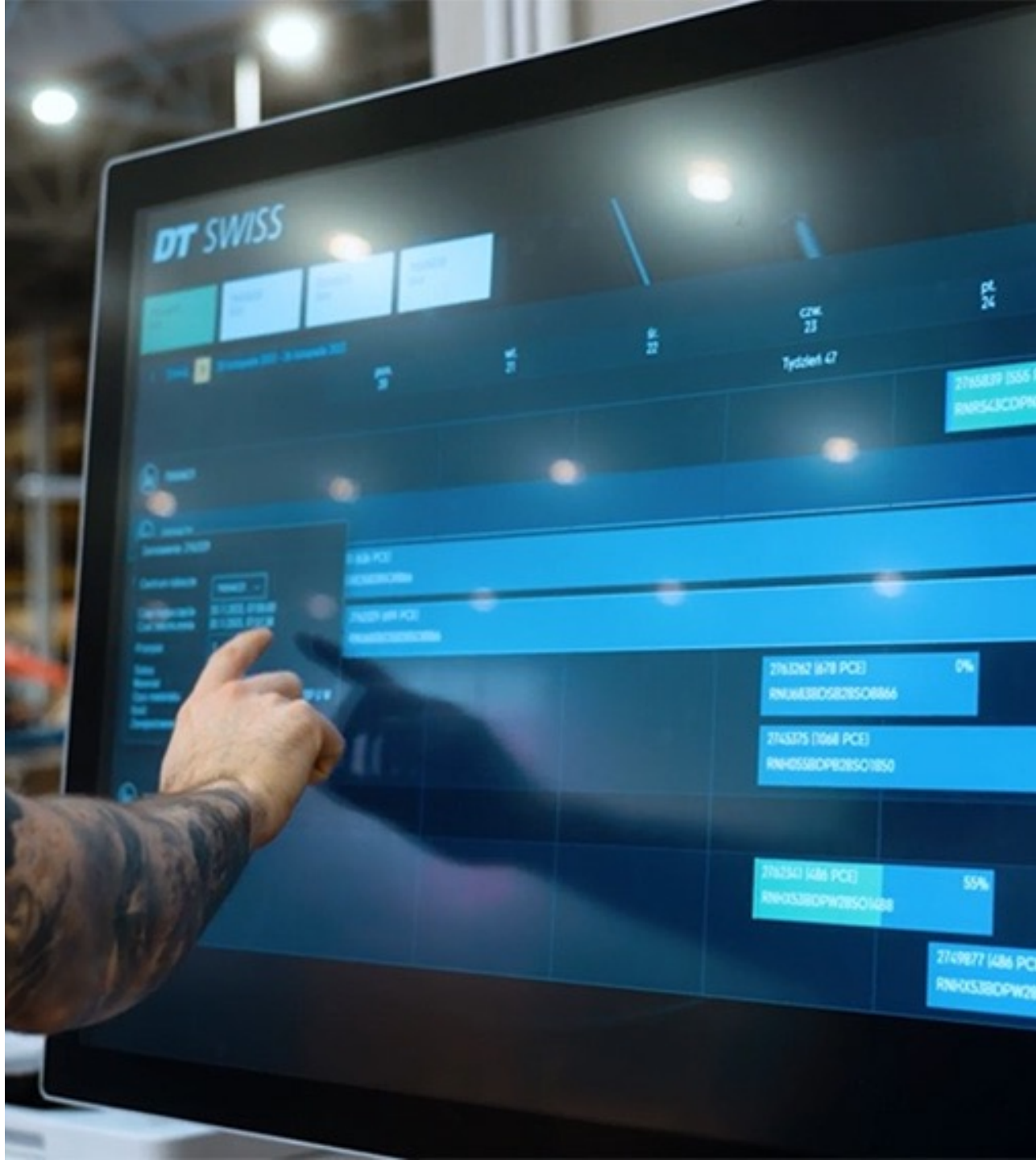
# GENERAL **INFORMATION**

Cybersecurity, defined as the practice of safeguarding systems, computers and data from digital attacks, emerged as a material entity-specific topic for DT Swiss during the Double Materiality Analysis. The analysis identified a financial risk associated with unauthorized attempts to steal, disclose, alter, disable, or destroy information via access to computer systems, which could significantly compromise operational continuity.
As cybercrime continues to increase worldwide, the likelihood of cyberattacks affecting DT Swiss cannot be ruled out. The implementation of cloud software and interactions with external agents, such as customers and vendors, requires easy and uninterrupted access to complete data and systems to maintain operational continuity. However, this increasing digitization of business processes also increases the risk of cyberattacks. A cyber incident leading to system downtime could, in the worst-case scenario, stop administration and production processes, resulting in significant financial implications for the company. Therefore, it is crucial to prevent any unauthorized access and use of data and systems. However, the scope of IT security is large because of the different attack techniques, such as malware, ransomware, spam, phishing and DoS (denials of service).

Currently, DT Swiss has implemented several cybersecurity measures, although formalized policies in the areas of Information Security Management and Cybersecurity Governance are still limited. Nevertheless, the management is aware of related frameworks, such as the ISO 2700 series, and the strategic objective is to formalize all existing and future measures by 2028.



DT SWISS

# 8.2

# LEVERS AND KEY ACTIONS

# LEVERS AND KEY ACTIONS

To address the identified risk, DT Swiss has taken a number of measures that can be clustered as follows below, in accordance with the principles of an information security management system (ISMS). All measures are coordinated centrally by the IT department at the company's headquarters.

**DATA SECURITY**
DT Swiss ensures that all network traffic is continuously monitored and analyzed to detect anomalies and potential threats at an early stage. The company operates a fully outsourced Security Operations Center (SOC), which provides 24/7 surveillance and incident response capabilities. In addition, external intrusion testing has been successfully conducted to validate the resilience of the system landscape.
To build cyber resilience, detection mechanisms are implemented, such as continuous log monitoring to track system behavior. Additionally, prevention measures such as monthly system updates, including critical security patches, are applied to maintain a robust security posture.

**USER AND ACCESS MANAGEMENT**
Single users are clearly identified as each is provided with a Microsoft and/or SAP user profile.
Access to systems and data is governed by strict role-based access controls. User permissions are clearly defined and limited to what is necessary for operational tasks, thereby minimizing the risk of misuse or unauthorized access. Privileged access is also managed and only ICT employees are granted administrator access. Sensitive data is protected through highly restrictive access settings. Furthermore, users are not permitted to install software independently, meaning that all applications are checked and managed by the IT department.
Security is further enhanced through the implementation of session locking and automatic termination, as well as mandatory multifactor authentication and VPN usage for remote access.

**PHYSICAL ACCESS CONTROL**
Physical access to critical infrastructure, such as server rooms, is tightly controlled. Only authorized personnel with specific access rights can enter these areas. The server rooms themselves are designed with physical security in mind, featuring no windows and dedicated fire protection systems to mitigate risks.

**ASSET MANAGEMENT**
All IT assets such as tablets, monitors, phones and laptops are centrally managed by the IT department, ensuring consistent oversight, lifecycle tracking, and compliance with internal security standards.

While the current cybersecurity framework provides a solid foundation, some areas for improvement have been identified. These include the regular review and adjustment of user permissions, as recommended by recent IT audits. Additionally, DT Swiss aims to implement a classification system for data based on sensitivity, potentially supported by AI technologies. The company also plans to streamline its system architecture. As recommended by the IT auditor, DT Swiss plans to introduce a formalized Change Request Management (ChaRM) software (SAP ALM - Application Lifecycle Management) to establish a four-eyes principle, reduce the risk of technical errors and enable better audit-proof documentation. Finally, increasing awareness and providing targeted training for all employees who interact with IT systems will be a key focus area to strengthen the human aspect of cybersecurity.

# 9

# GLOSSARY

# GLOSSARY

| ABBREVIATION | EXPLANATION |
|---|---|
| ASM | After Sales Market |
| BGHW | Berufsgenossenschaft Handel und Warenlogistik. Is the statutory accident insurance institution for companies and their employees in retail and goods logistics in Germany. |
| CCF | Corporate Carbon Footprint. The CCF quantifies the total greenhouse gas emissions of a company over a specific period, usually one year. It includes direct emissions (Scope 1), indirect emissions from energy use (Scope 2), and other indirect emissions across the value chain (Scope 3), based on the GHG Protocol Corporate Standard. |
| CFRP | Carbon fiber reinforced polymer |
| CSRD | Corporate Sustainability Reporting Directive. An EU directive that requires companies to report detailed information on environmental, social, and governance (ESG) topics. |
| DMA | Double Materiality Assessment. A process required under the CSRD that evaluates both how sustainability issues affect a company's financial performance (financial materiality) and how the company's activities impact the environment and society (impact materiality). |
| EAC | Energy Attribute Certificate. Proof that an amount was energy was generated from renewable energy sources. They are used to track and claim the use of renewable energy. |
| EFRAG | European Financial Reporting Advisory Group. EFRAG is an independent advisory body that provides technical advice to the European Commission on corporate reporting. |
| ESRS | European Sustainability Reporting Standards. A set of EU standards developed by EFRAG to guide companies in reporting on environmental, social, and governance topics under the CSRD. The ESRS define what sustainability information must be disclosed |
| EKAS | Eidgenössische Koordinationskommission für Arbeitssicherheit. Central Information and Coordination Office for Occupational Safety and Health in Switzerland. |
| IPCC | The Intergovernmental Panel on Climate Change is the United Nations body for assessing the science related to climate change. See: https://www.ipcc.ch/ |
| IRO | Impacts, Risks, and Opportunities. A core concept in CSRD-aligned sustainability reporting. IROs refer to the significant environmental and social impacts a company causes or experiences, the related risks it faces, and the opportunities it can leverage. |

# GLOSSARY

| ABBREVIATION | EXPLANATION |
|---|---|
| GHG Protocol | The Greenhouse Gas Protocol (GHG Protocol) is a comprehensive global standardized framework for accounting and reporting greenhouse gas (GHG) emissions. |
| GWP 100 | Global Warming Potential over 100 years. |
| OECD | The Organisation for Economic Co-operation and Development – OECD is an international organization that works to build better policies for better lives. The goal is to shape policies that foster prosperity, equality, opportunity and well-being for all. See: https://www.oecd.org/about/ |
| OEM | Original Equipment Manufacturer |
| OSHA | Occupational Safety and Health Administration |
| PCF | Product Carbon Footprint. The PCF measures the total greenhouse gas emissions associated with a product. |

# 10

# ESRS INDEX

ESRS 2, IRO-2

# ESRS INDEX

| ESRS | CONTENT | LINK |
|---|---|---|
| **BP-1** | General basis for preparation of sustainability statements | GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT |
| **BP-2** | Disclosures in relation to specific circumstances | GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT |
| **GOV-1** | The role of the administrative, management and supervisory bodies | ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES |
| **GOV-2** | Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies | ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES |
| **GOV-3** | Integration of sustainability-related performance in incentive schemes | ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES |
| **GOV-4** | Statement on due diligence | DUE DILIGENCE |
| **GOV-5** | Risk management and internal controls over sustainability reporting | GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT |
| **SBM-1** | Strategy, business model and value chain | STRATEGY, BUSINESS MODEL AND VALUE CHAIN<br>DT SWISS OWN WORKFORCE |
| **SBM-2** | Interests and views of stakeholders | STRATEGY, BUSINESS MODEL AND VALUE CHAIN |
| **SBM-3** | Material impacts, risks and opportunities and their interaction with strategy and business model | IMPACTS, RISKS AND OPPORTUNITIES |
| **IRO-1** | Description of the process to identify and assess material impacts, risks and opportunities | DOUBLE MATERIALITY ASSESSMENT 2022 / 2024-2025 |
| **IRO-2** | Disclosure requirements in ESRS covered by the undertaking's sustainability statement | DOUBLE MATERIALITY ASSESSMENT 2022 / 2024-2025<br>CONTENT INDEX |

ESRS 2, IRO-2

# ESRS INDEX

| ESRS | CONTENT | ESRS 2 REFERENCE | BOUNDARY | LINK |
|---|---|---|---|---|
| **E 1** | Climate Change | ESRS 2 Gen. Dis.<br>SBM-3<br>GOV-3<br>IRO-1 | Climate-related considerations are not factored into the remuneration of members of the core management | GENERAL INFORMATION |
| **E 1-1** | Transition plan for climate change mitigation | | A formalized transition plan does not yet exist | GENERAL INFORMATION |
| **E 1-2** | Policies related to climate change mitigation and adaptation | | No policy has been developed yet | |
| **E 1-3** | Actions and resources in relation to climate change policies | MDR-A | | LEVERS AND ACTIONS SCOPE 1,2,3 |
| **E 1-4** | Targets related to climate change mitigation and adaptation | MDR-T | | CLIMATE CHANGE TARGETS |
| **E 1-5** | Energy consumption and mix | MDR-M | Energy intensity based on net revenue is not reported. | ENERGY DATA DT SWISS GROUP |
| **E 1-6** | Gross Scopes 1, 2, 3 and Total GHG emissions | MDR-M | Emission intensity based on net revenue is not reported | EMISSIONS DATA DT SWISS GROUP Scope 1 & 2<br>EMISSIONS DATA DT SWISS GROUP Scope 3 |
| **E 1-7** | GHG removals and GHG mitigation projects financed through carbon credits | | No GHG removals and GHG mitigation projects financed through carbon credits | |
| **E 1-8** | Internal carbon pricing | | No internal carbon pricing in place | |
| **E 1-9** | Anticipated financial effects from material physical and transition risks and potential climate-related opportunities | | Phase in used | |
| **E 5** | Resource use and circular economy | ESRS 2 Gen. Dis.<br>SBM-3<br>IRO – 1 | | OUR PRODUCTS |
| **E 5-1** | Policies related to resource use and circular economy | | There are currently no explicit policies on the subject of circular economy and resource use. | |
| **E 5-2** | Actions and resources related to resource use and circular economy | MDR-A | | LEVERS AND KEY ACTIONS |
| **E 5-3** | Targets related to resource use and circular economy | MDR-T | | RESOURCE USE AND CIRCULAR ECONOMY TARGETS |
| **E 5-4** | Resource inflows | MDR-M | | (RAW) MATERIALS , MATERIALS |
| **E 5-5** | Resource outflows | MDR-M | | |
| **E 5-6** | Anticipated financial effects from material resource use and circular economy-related risks and opportunities | | Phase in used | |

ESRS 2, IRO-2

# ESRS INDEX

| ESRS | CONTENT | ESRS 2 REFERENCE | BOUNDARY | LINK |
|---|---|---|---|---|
| **S 1** | Own workforce | ESRS 2 Gen. Dis.<br>SBM-2<br>SBM-3 | | THE DT SWISS SPIRIT |
| **S 1-1** | Policies related to own workforce | MDR-P | | THE DT SWISS SPIRIT |
| **S 1-2** | Processes for engaging with own workforce and workers' representatives about impacts | | | THE DT SWISS SPIRIT |
| **S 1-3** | Processes to remediate negative impacts and channels for own workforce to raise concerns | | | LEVERS AND KEY ACTIONS |
| **S 1-4** | Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions | MDR-A | | LEVERS AND KEY ACTIONS |
| **S 1-5** | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | | OWN WORKFORCE TARGETS |
| **S 1-6** | Characteristics of the undertaking's employees | SBM-1 | | DT SWISS OWN WORKFORCE |
| **S 1-7** | Characteristics of non-employees in the undertaking's own workforce | | Phase in used | |
| **S 1-8** | Collective bargaining coverage and social dialogue | | Not material | |
| **S 1-9** | Diversity metrics | MDR-M | Not material but included because of certain stakeholder interests | DATA OWN WOKRFOCE |
| **S 1-10** | Adequate wages | | | DATA OWN WOKRFOCE |
| **S 1-11** | Social protection | | Not material | |
| **S 1-12** | Persons with disabilities | | Not material | |
| **S 1-13** | Training and skills development metrics | | Not material | |
| **S 1-14** | Health and safety metrics | MDR-M | | WORK RELATED INJURIES |
| **S 1-15** | Work-life balance metrics | | Not material | |
| **S 1-16** | Remuneration metrics (pay gap and total remuneration) | | Material topic, but no data points available. Efforts are underway to enable transparent reporting in the future. | |
| **S 1-17** | Incidents, complaints and severe human rights impacts | | Not material but included because of certain stakeholder interests | DATA OWN WOKRFOCE |

ESRS 2, IRO-2

# ESRS INDEX

| ESRS | CONTENT | ESRS 2 REFERENCE | BOUNDARY | LINK |
|---|---|---|---|---|
| **S 2** | Workers in the value chain | ESRS 2 Gen. Dis.<br>SBM-2<br>SBM-3 | | GENERAL INFORMATION |
| **S 2-1** | Policies related to value chain workers | | | POLICY |
| **S 2-2** | Processes for engaging with value chain workers about impacts | | As of today, there is no precisely defined process in place. | |
| **S 2-3** | Processes to remediate negative impacts and channels for value chain workers to raise concerns | | See Due Diligence Chapter under General Disclosures. Introduction of the whistleblowing system via the website in 2025 | |
| **S 2-4** | Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those action | MDR-A | | LEVERS AND KEY ACTIONS |
| **S 2-5** | Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities | MDR-T | | WORKERS IN THE VALUE CHAIN TARGETS |
| | Cybersecurity | ESRS 2 Gen. Dis. | | GENERAL INFORMATION |
| | Policies related to cybersecurity | MDR-P | | |
| | Key actions related to cybersecurity | MDR-A | | LEVERS AND KEY ACTIONS |
| | Targets related to cybersecurity | MDR-T | No targets defined until now | |

# YOUR **CONTACT**

For more information, please contact us:
**sustainability@dtswiss.com**

**DT SWISS AG**
Längfeldweg 101
2504 Biel/Bienne
Switzerland

DT SWISS

ENGINEERING PERFORMANCE