

Updated

Environmental Statement

2026



EMAS

GEPRÜFTES
UMWELTMANAGEMENT
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Contact

We are grateful for any criticism or suggestion regarding our Environmental Statement and would like to ask you to contact our Sustainability & Environment Manager directly in this regard.

Dr. Schumacher GmbH

Am Roggenfeld 3
34323 Malsfeld-Beiseförth

Dr. Manfred Möller
T +49 5664-9496-6801
manfred.moeller@schumacher-online.com

Mr. Oliver Selmanovic
T +49 5664 9496-6802
oliver.selmanovic@schumacher-online.com

Legal notice

Publisher

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Germany
T +49 5664 9496-0
F +49 5664 8444
info@schumacher-online.com

www.schumacher-online.com

You can find the current environmental statement in the download area of our website.

Abbreviations

AISE

(International Association for Soaps, Detergents & Maintenance Products)

EMAS

Eco Management and Audit Scheme

IMS

Integrated Management System

MR

Management Representative

PDCA

Plan Do Check Act

VOC

Volatile Organic Compounds





Management of Dr. Schumacher GmbH: Dierk Schumacher (right), Dirk Hamenstädt (left)

Foreword from the management

Dr. Schumacher GmbH offers its customers products and services of the highest quality. The quality management system, which has been certified according to ISO 9001, DIN EN ISO 13485 for years and meets the requirements of the pharmaceutical GMP, is an indispensable prerequisite for the company's success.

In addition, meeting the requirements with regard to occupational safety and environmental protection are important components of our business activities.

To meet the continually increasing awareness of safety, the requirements of operational environmental protection, and the legitimate interests of an increasingly sensitised public in the best possible way, Dr. Schumacher GmbH has, for more than fifteen years, operated a management system that integrates occupational health and safety and environmental protection considerations. This management system has been validated according to EMAS III and also meets the requirements of the standards DIN EN ISO 14001:2015 and DIN EN ISO 45001:2023. An overview of the company's environmental performance and environmental aspects has been summarised in the current environmental statement.

In addition, we have met the requirements of the AISE for our cleaning agents. The certifications according to FSC/PEFC (sustainable forestry) and RSPO (sustainably managed palm oil) were also successfully maintained.

We reject child labour, all forms of forced labour and discrimination, as well as disciplinary measures that lead to physical or psychological harm. The health and safety of our employees are very important to us and we are committed to providing suitable working conditions at all times. We also expect our suppliers to comply with these principles.

With this sixteenth update of our environmental statement, we aim to inform the interested public – particularly our customers and neighbours – about the development of environmental management and the environmental aspects of all activities at the Malsfeld-Beiseförth site. We also offer this update of the environmental statement as a download on the Internet (www.schumacher-online.com). This will give you an insight into the development of significant environmental impacts as well as the implementation and updating of our environmental goals.

Dr. Schumacher GmbH

Geschäftsführung

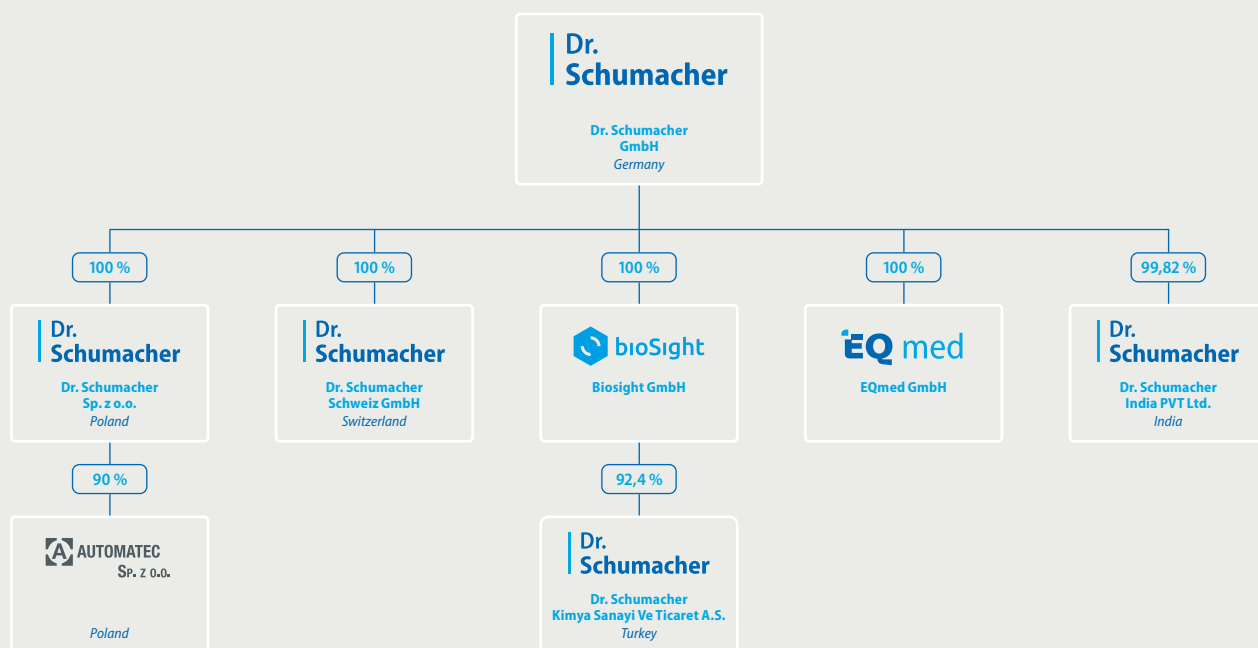


Dierk Schumacher



Dirk Hamenstädt

Dr. Schumacher GmbH



Other investments are shown in the figure above

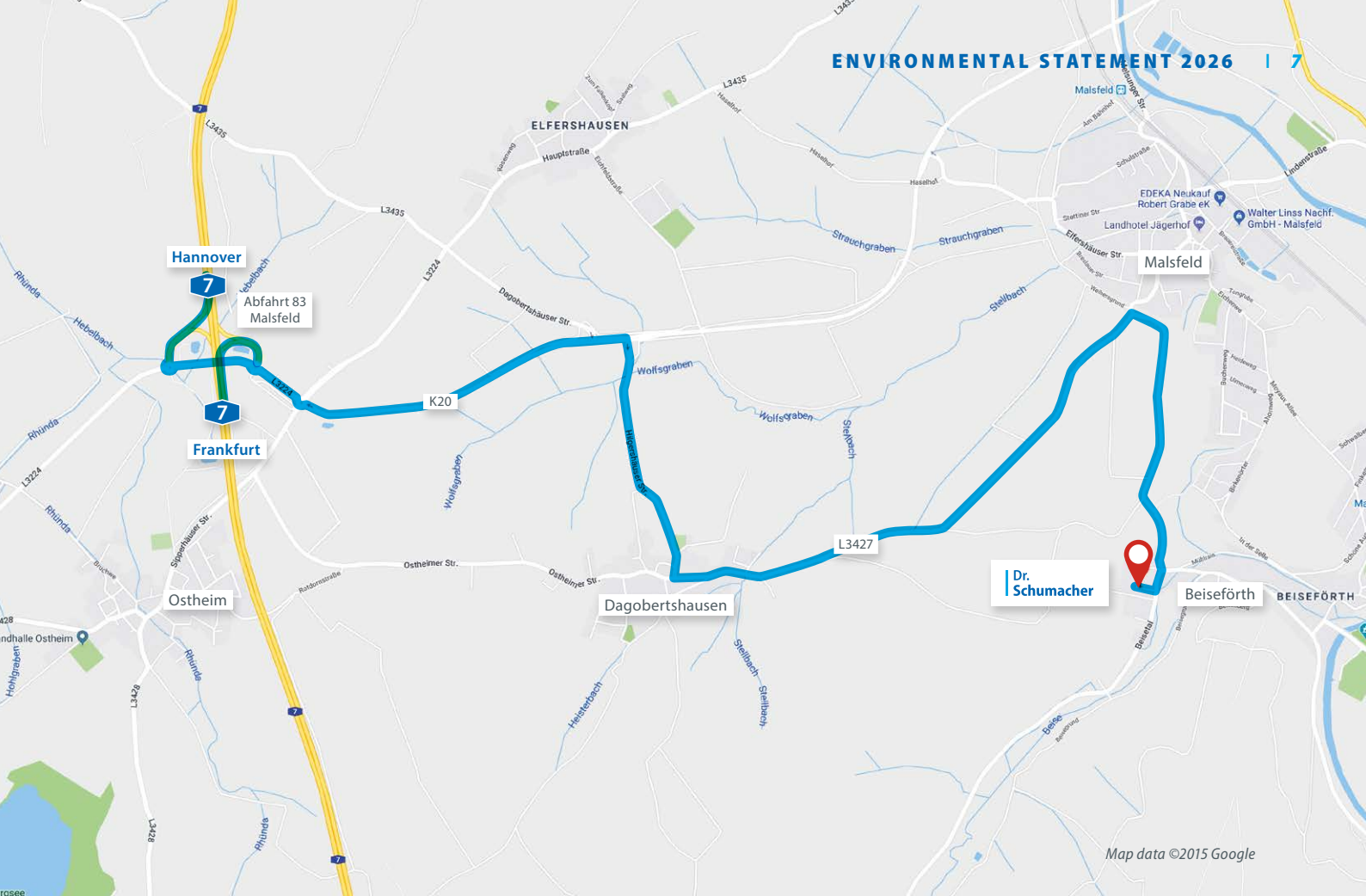
Dr. Schumacher GmbH was founded in 1978 by Dr. Henning Schumacher, the father of the current Managing Director, Dierk Schumacher. It is engaged in the development, manufacture and distribution of disinfectants and cleaning agents that are placed on the market as biocidal products, medical devices, medicinal products and detergents. Cosmetic products are also manufactured at the site

Delivery is mainly to professional customers in the medical field. Wet wipes for a wide range of applications, such as the cosmetics sector, are manufactured at another site in which Dr. Schumacher GmbH holds an interest. The Malsfeld-Beiseförth site is located about 30 km south of Kassel and 5 km east of the A7. About 380 people are employed at the site, which is surrounded by residential buildings. In addition to offices, the production and storage facilities are located there.

As a manufacturer of skin and hand disinfectants, the production site is subject to pharmaceutical legislation. A manufacturing licence from the Darmstadt Regional Council has been obtained for the production of the pharmaceuticals. Disinfectants (biocidal products, medical devices), cleaning agents (medical devices, detergents) and cosmetics are also produced at the site. Due to the production of more than 5 tonnes of biocides per day, the site is subject to the 4th Federal Immission Control Ordinance (4th BImSchV). The requested amendment permit pursuant to § 16 of the Federal Immission Control Act (BImSchG) was granted on 20 January 2023 by RP Kassel. During the reporting year, parts of the permit were already implemented, and the commissioning of these facilities was notified to the authority. The further implementation of the permit and the associated require-

ments are carried out in close cooperation with the authority. In the reporting year, an application was also submitted for an extension of the air-emissions control permit for the expansion of the facility. As this is no longer carried out on a concentrating basis, applications were submitted – by agreement with the competent authorities – for extensions of the permits that were originally included in the air-emissions control permit. This concerned the permits pursuant to § 18 of the German Ordinance on Industrial Safety and Health (BetrSichV), water-law suitability assessments, and the permit under the Hessian Building Code (HBO).

More than 200 tonnes of environmentally hazardous substances or mixtures are stored at the site. For this reason, Dr. Schumacher GmbH is a company that falls within the scope of the 12th Federal Immission Control Ordinance (12th BImSchV – Major Accidents Ordinance). Due to the construction measures, the company is currently subject to annual official monitoring. The most recent monitoring took place on 21/05/2024 with a focus on water law and unauthorised access options. No serious deficiencies that could prevent the safe operation of the company were found. The potential for improvement identified concerned minor structural measures and the updating of documents. These deficiencies were remedied by the end of the 2024 reporting year. As all air-emissions-control-related matters have now been reviewed at least once during the annual inspections and no significant deficiencies were identified, the authority was able to extend the monitoring interval to three years. The next regular monitoring is therefore planned for 2027.



Beiseförth site, map data ©2015 Google

The site, which is not classified as a water protection area, is located approximately 100 m from a drainage ditch (mill leat), which flows into the Beise, which in turn flows into the Fulda, located about 3 km away. The sanitary wastewater is fed into the municipal sewer system.

Both the raw materials and the products are, in part, classified under chemicals and transport legislation as hazardous substances or dangerous goods, which may pose a potential hazard to human health and the environment. Some of our waste (such as laboratory waste and waste oils) is also classified as hazardous under the German Circular Economy Act (KrWG) and is therefore disposed of properly exclusively through certified waste management companies. When handling substances hazardous to water, we comply in particular with the relevant federal ordinance.

As part of the emergency organisation, fire protection concepts approved by the building supervisory authority are in place. Smoke and heat extraction systems, a fire alarm control centre, emergency procedures, escape and rescue route plans, fire-fighting equipment, escape route signage, etc., are in place. As a result of the structural measures, the legally required containment of fire-fighting water is ensured in all areas where products are manufactured and filled, bulk materials are temporarily stored, or finished products are stored. The staging area in the dispatch section is connected to the warehouse containment system via a channel. In the event of a fire, it is ensured that sufficient extinguishing water is available.

To ensure the safe operation of the facilities, the requirements of the German Ordinance on Industrial Safety and Health (BetrSichV) are complied with in particular. To ensure that our employees do not suffer any harm to their health as a result of their activities at the site, the occupational accident insurance regulations and statutory occupational health and safety regulations are complied with. Other relevant standards, requirements and legal requirements are recorded in a list, which is regularly checked for up-to-dateness and applicability.

The most important environmental legislation comprises the Federal Immission Control Act (BImSchG) and the ordinances based on it, in particular the 4th and 12th Federal Immission Control Ordinances (BImSchV). In addition, the Ordinance on Installations for Handling Substances Hazardous to Water (AwSV) is of very high importance. Compliance with these legal provisions is confirmed.

Dr. Schumacher GmbH is a manufacturing company. Investments and acquisitions are therefore undertaken primarily in order to ensure production and the provision of the necessary services. Entrepreneurial risks and opportunities are assessed internally and contribute to decision-making. The most important non-financial performance indicators are the manufacture of safe and high-performance products.

The social aspects of our company are described in the following company policy.

Company

We aim to be a fair partner to our customers. This includes:

- *Development, manufacture and distribution of effective, user-friendly products that are as environmentally compatible and cost-effective as possible*
- *Provision of tailored, customer-oriented advisory and training services*
- *Continuous feedback from users, the scientific community and authorities*
- *Fulfilment of customer requirements, as well as legal and regulatory requirements*
- *Determination and implementation of specific quality requirements*

The quality and reliability of our products and services have a significant impact on the success of our company and thus on the security of our employees' jobs. We aim to achieve sustainable economic success in our business activities, giving due consideration to quality management in conjunction with environmental protection and occupational health and safety. We also expect this from our suppliers.

In compliance with the applicable regulatory requirements, we undertake to meet customer requirements and to maintain the effectiveness of our quality management system. With the quality of our products and services, we comply with the current state of the art. In doing so, we strictly observe the external quality requirements and standards that result from legal requirements, the quality expectations of customers, and voluntary commitments. Product safety, compliance with the applicable standards and internal specifications, and the satisfaction of customers and consumers are therefore our highest priority. We undertake to keep the buildings, machines and equipment up to date in order to minimise the risk of a loss of quality of the products and the risk to employees. When manufacturing our products, we comply with the requirements of GMP.

We strive to minimise the consumption of raw materials, energy and water. In addition, we undertake to assess, control and reduce environmentally relevant impacts and to avoid or minimise emissions, waste, wastewater and noise. Beyond compliance with relevant standards, conditions and legal requirements, we are committed to the continuous improvement of the quality of our products and of operational environmental protection and occupational health and safety. An important factor for our success is our employees, who, as active co-creators in the company's activities, ensure that we achieve our goals. Protecting the health of our employees, preventing accidents at work and assessing risks in the workplace are very important to us.

In the production of wet wipes for some of our customers, we additionally commit to implementing, maintaining, defining and documenting the chain of custody (CoC) requirements of the PEFC standard PEFC ST 2002:2020 as well as the Forest Stewardship Council standard "FSC Standard for Chain of Custody Certification" (FSC-STD-40-004). Until further notice, the method of "physical separation" or the "transfer system" with regard to the FSC will be used for the PEFC.

We undertake to comply with the social and ethical standards according to SA 8000 and the applicable legal standards in this regard. We reject child labour, any kind of forced labour and any form of discrimination, regardless of the reasons. On the other hand, we support the right to freedom of assembly and freedom of expression. We foster a respectful approach towards our employees, as only employees who feel comfortable and valued in every respect within the company can ensure its long-term success. We reject any form of corruption. We also expect our suppliers to comply with these standards and verify this, among other things, through selective audits.

We are committed to complying with the RSPO (Roundtable on Sustainable Palm Oil) standard in its current version. We use the "Mass Balance" supply chain model. We attach great importance to informing, motivating and training employees, who work together openly and constructively in cross-divisional teams. Through regular evaluations, we ensure that these guidelines are adhered to. If deviations occur, we will initiate appropriate corrections.

Malsfeld-Beiseförth, 14/01/2026



Dierk Schumacher



Dirk Hamenstädt

Environmental management system

A management representative has been appointed for the standard-compliant introduction and implementation of the integrated management system (IMS). While the company's specialist and managerial staff (line functions) are responsible for the proper fulfilment of environmental and safety obligations, additional designated officers and specialists (staff functions) have been appointed for a number of tasks as required by law, such as occupational safety specialists, company physicians, first aiders, safety officers, fire safety assistants, emissions control officers, major accident prevention officers, and waste management officers. After the position of fire safety officer was vacant in 2024 and responsibility was temporarily assumed by the management, an internal fire safety officer was appointed in the current reporting year, 2025. This ensures that the continuous oversight of all fire-safety-related matters is once again fully guaranteed.

The procedures for implementing the Integrated Management System (IMS), as described in a manual, are designed to achieve continuous improvement. The underlying methodology is also called the PDCA cycle. This is achieved through consistent planning by formulating objectives and programmes on the basis of the company policy (plan). The company policy of Dr. Schumacher GmbH provides the framework for defining and evaluating objectives and is communicated to all employees, including those working on behalf of the company. The implementation is aimed at optimising the respective processes (Do). The implementation of corrective measures in the event of deviations (Check) and the regular evaluation of the system's performance (Act) are the "engine" of the system.

Assessment of risks and opportunities

Risks/opportunities	Category	Assessment (probability of occurrence)
Risk: Increased energy demand and thus deterioration of environmental performance due to heat periods, resulting in higher energy demand for air-conditioning systems	Environmental incidents	The event is expected to occur on a maximum of 20 days per year. This seems acceptable
Risk: Impairments due to severe weather events (heavy rain, storm, snow)	Environmental incidents	Occurrence is unlikely
Risk: Occurrence of a malfunction; uncontrolled leakage of hazardous substances/interruptions to operations	Air emissions control, emergency preparedness	Occurrence is unlikely
Risk: Occurrence of accidents at work	Occupational safety	Occupational accidents occur occasionally (under 10 per year)
Risk: Overloading of employees and thus decrease in motivation with regard to environmental issues	Internal issues/existing knowledge within the company	Low, as environmentally relevant processes (e.g., disposal routes) are largely defined.
Risk: High costs/penalties for ad hoc or retrospective implementation of new legal requirements.	Internal issues/existing knowledge within the company	Relatively high due to the wide range of new requirements. Environmental newsletters often get bogged down in minor details, meaning that important changes can be overlooked.
Risk: Release of hazardous substances due to leakages	Direct environmental aspects	Generally unlikely due to the presence of containment barriers, but problematic in the event of a major incident
Risk: Environmental impact of incorrect disposal of in-house waste	Direct environmental aspects	Low, as environmentally relevant processes (e.g., disposal routes) are largely defined.
Risk: Uncontrolled disposal of packaging waste (external)	Indirect environmental aspects	Low, as disposal of packaging waste is ensured via dual systems.
Risk: Environmental impact of plastic packaging	Indirect environmental aspects	Relatively high, as the PPWR is expected to be implemented in 2024. Increased pressure from the consumer sector is to be expected.
Risk: Stricter legislation regarding non-sustainable products (e.g., the Single-Use Plastics Fund Act)	Direct environmental aspects	The legislation is already in place and provides for comparatively high costs for the wipes.
Risk: Stricter requirements for, or the prohibition of, certain substances, and more critical classification of substances and products	Political and legal factors	Relatively high, as substances are regularly reclassified, which rarely results in a lower classification.
Opportunity: Building trust within the local community and increasing tolerance of short-term negative effects in production through open communication.	Residents	Currently lower than in previous years, as the potential upcoming expansion of the high-bay warehouse has already been communicated to the neighbours as part of the permitting procedure.
Risk: Financial risks due to the new building or due to interruptions to operations	Banks, shareholders	Low, as the financing of the new building has been soundly planned; the risk of operational interruptions due to major incidents has been minimised

Assessment (impact)	Need for action
Low impact, as energy peaks are predictable.	None
The new building was constructed in compliance with TRAS 320 ("Precautions and measures relating to hazards from wind, snow and ice loads"). Therefore, low impact expected.	None
Impact would be catastrophic	None; measures defined in the SOP; annual training courses conducted
Workplace accidents may have serious consequences.	Implement more preventive measures and provide additional training. Create further operating instructions. Avoid overloading employees.
The impact may be significant if hazardous substances are discharged into the sewer system.	Regular training courses taking into account topics relevant to environmental and labour law
The impacts may be severe (e.g., missing permits)	More external support that informs about relevant changes in the law. Attendance at a greater number of external environmental law events. More human resources
The impacts may be severe.	None
The impact may be significant if hazardous substances are discharged into the sewer system.	Regular training courses taking into account environmentally relevant topics; coordination with departments if necessary
The impact may be significant if packaging waste is disposed of in an unregulated manner.	None
The impact can be significant in terms of customer loyalty.	Optimisation of packaging with regard to the use of PCR materials in the consumer sector
High financial burden on wet wipe production.	Replacement of synthetic nonwoven materials with nonwovens made from natural materials (viscose, lyocell).
The impacts may be severe (including, for example, with regard to approval)	Regular monitoring of classifications (ECHA) and proactive provision of information to R&D in order to make any necessary formulation adjustments.
The impacts may be serious, as objections from neighbours may delay or prevent planned construction measures.	Continue to communicate openly and honestly with neighbours
Serious, as this could substantially affect the company	Maintaining cost planning in all departments coordinated by controlling; minimising the risk of business interruptions. Maintaining the high equity ratio

Stakeholder analysis

Interested party	Expectations/requirements	Meaning
Personnel	Safe workplace; reasonable salary; reasonable working environment	High
Residents	Noise reduction, minor impairment of living conditions	Medium
Public	Transparent communication and easily accessible information about the company; Social and environmental sustainability	Medium
Authorities	Respect for applicable law (including environmental and labour law) and direct notification of violations; timely response to inquiries	High
Authorities	Observance and implementation of requirements arising from exceptional situations.	Medium
Customers	Compliance with environmental protection, occupational safety and social-ethical production standards. Compliance with all legal and normative requirements relevant to the products.	High
Customers	Supply of safe products that meet the stated specifications and are manufactured in the most environmentally friendly way possible, at reasonable prices; Professional and qualified advice; Provision of necessary services (e.g., product training; support with overseas registrations)	High
Suppliers	No expectations are known from suppliers regarding requirements related to the environment, occupational safety, or compliance with normative standards	Low
Banks	Expectation of sound financial planning by the company, ideally while maintaining a high equity ratio.	High
Insurance	Compliance with product, environmental and occupational safety requirements and corresponding supplementary standards and guidelines	High
Shareholders/owners	Further development and expansion of the company while maintaining a sound economic basis	High
Occupational physicians, professional associations, occupational safety specialists	Compliance with occupational health and safety regulations; implementation of preventive measures to avoid workplace accidents and the occurrence of long-term employee damage that may lead to work-related occupational disability.	High
Rescue organisations (fire brigade)	Immediate receipt of all important information relevant in the event of an emergency response.	High
Certifiers/notified bodies	Compliance with applicable law (including environmental and labour law), any harmonised standards or other requirements on which the respective certification is based.	High

	Risks/opportunities	Possible activities
	Risk: Partly high investment requirements; internal reorganisations required Opportunity: Increasing motivation among employees through strong identification with the company	Actively involve employees in the creation of environmental, quality and occupational safety goals and communicate their implementation internally in a targeted manner; promotion of occupational safety and expansion of preventive measures
	Risk: Conflicts and legal disputes in the event of neglect of complaints or disregard for the interests of residents Opportunity: Avoidance of conflicts and litigation through cooperative action; enhancement of corporate image	Reduction of inbound and outbound traffic through optimised route planning and utilisation; internal transport using electric rather than diesel forklifts during morning and evening hours Assessment of noise pollution caused by ventilation systems at Buildings I/H
	Risk: Disclosure of confidential information Opportunity: Building trust within the local community and increased tolerance of short-term negative effects in production.	Expansion of external communication, e.g., direct communication with residents (e.g., in the case of construction projects) "Professionalisation" of external communication; better preparation for crises (e.g., creation of a "backup website" for emergencies)
	Risk: Stricter requirements and extended approval procedures, more frequent on-site inspections in the event of withholding information Opportunity: Simplified approval procedures and better cooperation with active and open communication Opportunity: Receiving information about new legal developments	Active engagement with authorities, for example through attendance at specialist events organised by authorities; active participation in environmental or occupational health and safety committees (e.g., Environmental Working Group, North Hesse)
	Risk: Stringent requirements; restrictions on business activities Opportunity: Strengthening the market position; improving the reputation with the authorities	Permanent establishment of a crisis management team; definition of procedures for special measures, specifying which departments must be involved.
	Opportunity: Strengthening customer loyalty through credible commitment	Maintaining environmental protection, occupational safety and social-ethical certifications
	Opportunity: Strengthening customer loyalty through credible, secure products	Sustainable product development; development of innovative products with new active ingredients to replace "old" products with dangerous active ingredients (e.g., aldehyde products)
	Implementation of the Supply Chain Due Diligence Act (now on a voluntary basis only due to falling below the turnover threshold under the CSDDD)	Amendment of contracts to include sustainability clauses; consideration of conducting awareness training for suppliers Consideration of giving preference to procurement from women- or diversity-led suppliers (background: EcoVadis rating)
	Risk: Administrative effort; high investments in the new building Opportunity: Granting of favourable loans; maintaining the company's sound financial basis	Continuation of the far-sighted cost planning of the individual departments and the sales planning of the different sales areas.
	Risk: Effort required to communicate compliance with requirements Opportunity: Safeguarding the company in the event of damage	Installation of the sprinkler system in the high-bay warehouse or implementation of an alternative solution
	Risk: Provision of sufficient resources for further expansion (in particular, qualified personnel who also bring in external experience of industry-specific requirements). Opportunity: Long-term survival of the company	Forward-looking strategic corporate planning in which employees are also involved at a fundamental level. Provision of sufficient resources for further expansion (in particular, qualified personnel who also bring in external experience of industry-specific requirements).
	Risk: Investment expenditure Opportunity: Cost savings through, for example, lower contributions to the employers' liability insurance association; increased employee motivation	Strengthened implementation of preventive measures relating to occupational safety and health
	Risk: none Opportunity: Minimising the impact of an emergency or malfunction	Carrying out emergency exercises with the fire brigade
	Risk: Loss of certification Opportunity: Enhancement of corporate image through maintaining certifications; cost savings and increased safety through the definition and adherence to appropriate processes	Maintain documentation and uphold certifications.

Environmental aspects

Environmental aspects are the components of a company's activities, products or services that have or may have an impact on the environment. These arise primarily from the life cycle of the products and are assessed on the basis of potential environmental, economic and social impacts.

The following criteria are used to evaluate the environmental aspects relevant to our company:

1. Environmental hazard potential: the specific risk to the environment arising from the environmental aspect, normalised by quantity.
2. Environmental vulnerability: sensitivity of the environment to the aspect introduced into it by the company.

3. Extent, number, frequency and reversibility: impact assessed taking into account the absolute amount and with regard to whether the impact is reversible.
4. Legal requirements: existence of environmental regulations that must be complied with.
5. Social requirements: importance for interested parties. Particular attention is paid to residents and employees.

The assessment of the environmental aspects is compared with the potential for improvement on the part of the company. From this, the environmental objectives and the environmental programme are derived, with highest priority given to aspects of high significance where the company has a strong ability to influence improvements.

Presentation of environmental aspects

Environmental aspect	Environmental impact	Category	Opportunity for improvement
Direct aspects			
Energy consumption/energy efficiency	Consumption of resources in particular fossil fuels	I	2
Water	Consumption of resources	I	1
Waste	Land use impacts associated with disposal	I	1
Soil	Sealing of floor surfaces	I	1
Discharges into wastewater	Consumption of resources	I	1
Emissions	Contribution to global warming	I	1
Noise	Impact on residents as an interested party	II	1
Water-polluting substances, hazardous substances, hazardous goods	Pollution of the environment (soil, water, air) during production, use and disposal	III	2
Accidents and possible emergencies with an impact on the environment	Adverse impact on the environment, residents and employees	III	2
Impact on biodiversity	Effects on fauna and flora	I	1
Product-related aspects (Selection of packaging, ingredients)	Resource consumption at suppliers	I	2
Indirect aspects			
Product-related aspects (transport, use, disposal)	Disposal of products by customers	I	1
Environmental behaviour of suppliers and service providers	Production at the supplier or service provider	I	1
Waste	Generation of emissions (external)	I	1

Direct environmental aspects

The specific energy consumption (electricity), i.e., energy use relative to production volume, can be reduced in particular through optimisation of the filling lines. More efficient filling into individual containers can be achieved through higher-performance lines, resulting in a more economical and energy-efficient process. Given the current machinery setup, a further reduction in electricity consumption does not currently appear to be possible. However, the procurement of additional production facilities is also planned as part of the expansion measures. Energy consumption has an impact on the consumption of non-renewable energy sources. We therefore aim to supply our energy with an increasing share of renewable energy sources.

In the case of fossil fuels, the consumption of diesel fuel in particular is an essential parameter. Although this does not occur directly at the site but is generated through field staff activities or travel between sites, it is nevertheless taken into account in this environmental statement. Consumption can be reduced through optimisation of travel planning and by converting parts of the vehicle fleet to cars with alternative drivetrains.

In order to keep the increase in heating oil consumption, as a further fossil fuel, to a minimum despite the expansion of operations, energy recovery from the exhaust air has been installed in the new building. This is also being integrated into existing buildings. With regard to waste management, consistent and proper disposal of waste is ensured. Preference is given to recycling over disposal, if this is possible. There is no direct discharge into or abstraction from bodies of water. The rinsing wastewater will continue to be disposed of as hazardous waste via appropriate disposal companies in accordance with the applicable legal standards. Waste is already largely segregated, ensuring compliance with the requirements of the Commercial Waste Ordinance.

While no noise disturbance arises from our installations that could adversely affect neighbours, the noise generated by vehicle traffic on our premises represents a perceptible source of noise. However, this is not to be regarded as significant, as the movement of goods only takes place during the day from 7:00 a.m. to 3:00 p.m. As part of the new construction project, a noise forecast in accordance with Technical Instructions on Noise Abatement (TA Lärm) was prepared, which shows that no exceedances of the guideline values are expected during daytime hours. For night-time hours, the slight exceedances originally forecast are avoided through structural measures.

If impacts on neighbours occur, these are assessed and, where possible, measures are taken to minimise any adverse impacts on neighbours. The noise limit values according to the present building permits are complied with.

Odours and dust emissions that could result in environmental impact or nuisance to local residents do not occur as part of the production process. Transport-related disturbance caused by HGV traffic cannot be avoided. However, we endeavour to minimise noise nuisance as far as possible by maximising vehicle utilisation and restricting travel times.

As a result of the construction measures, approximately 10,000 sqm of the total site area of around 18,500 sqm are now developed. A further construction project provides for the long-term expansion of the high-bay warehouse. The foundation work for this has already been implemented in accordance with an existing building permit. The start of the implementation of the further construction measures for the high-bay warehouse is not foreseeable due to the current global situation. For external areas such as parking spaces, soil sealing is largely avoided, as soil sealing generally contributes to the loss of natural habitats.

The company is geographically located in an area where the presence of rare animal or plant species is not to be expected, as there are no nature reserves or biotopes in the immediate vicinity. An impact on biodiversity is therefore not to be expected.

There is a potential risk to the environment from fire or leaks due to the company's activities. However, this risk is minimised to an unavoidable residual risk through various measures, such as the installation of a fire alarm control centre, the provision of fire extinguishers, the placement of processing and storage tanks in spill containment trays, and the design of the warehouse floor as a liquid-tight containment area.

Through the implementation of a safety concept as well as emergency plans and continuously updated safety reports, organisational measures are also taken to prevent the occurrence of incidents and to enable rapid and targeted responses in the event of an incident.

The company is, of course, available to answer questions and suggestions from the municipality or residents.

Indirect environmental aspects

The following indirect environmental aspects are relevant for our business activities:

1. Product-related effects (for the user)

- The use of hazardous substances is unavoidable, especially in the production of disinfectants. However, the proportion of these substances in the product is kept as low as possible. In addition, regular assessments are made as to whether an exchange for less hazardous substances is possible.
- With regard to cleaning agents, our products sustainably meet the requirements of the International Association for Soaps, Detergents and Maintenance Products (AISE).
- The product solutions are used by the end user as intended and discharged via the sewer system to the respective wastewater treatment plant.
The selection of raw materials is made, wherever possible, on the premise of biodegradability and thus leads to a minimisation of environmental impact. Residual amounts of disinfectant concentrates must be disposed of by customers as hazardous waste in accordance with the safety data sheets and in compliance with local requirements.
- The packaging consists mainly of recyclable components, and we are constantly working to increase the recyclability of our packaging. This is to ensure that the emptied packaging can be recycled via take-back systems. In addition, we are working to increase the proportion of recycled material in our packaging in accordance with the applicable and expected future legal standards.

2. Impact on suppliers

When selecting suppliers, the environmental performance of the suppliers is taken into account. A supplier certified in accordance with DIN EN ISO 14001 or EMAS is rated more favourably in the supplier evaluation and is preferred in contract awards over a supplier with an equivalent performance profile who cannot demonstrate such certifications. We strive to keep the transport routes as short as possible in the course of procurement. This is ensured, among other things, by delivering raw materials as directly as possible to the plant where the goods are required. On the other hand, we endeavour to procure the goods from companies that are as geographically close as possible.

Environmental performance

The core indicators are energy consumption, material consumption and the generation of emissions and waste. In addition, land use with regard to biodiversity is considered.

Energy consumption is calculated on the basis of electricity consumption, which has been sourced entirely from renewable sources since 2013, diesel fuel consumption, and heating oil consumption. The electricity consumption is calculated based on the respective monthly consumption bills. Diesel fuel consumption is determined based on diesel deliveries to the company's own small filling station and the internal diesel accounts of the various vehicles, taking into account inventory levels at the beginning of the respective year and the average price of diesel deliveries (1 litre of diesel = 0.00971 MWh). Heating oil consumption is calculated as the sum of deliveries made during the year, taking into account inventory levels (1 litre of heating oil = 0.009971 MWh).

Material consumption takes into account the consumption of chemical raw materials, primary plastic packaging and secondary cardboard packaging required for the production of finished goods. The merchandise is also taken into account. The calculation is carried out on the basis of a software evaluation from the company's internal ERP system. Water consumption is considered to be the sum of the consumption incurred during the year at the respective water meters. In addition to the water that flows into the products, this also includes the water that is discharged into the sewage system as wastewater during water treatment. For the wastewater generated in this process, which falls under Annex 31 of the Wastewater Ordinance (Abwasser-Verordnung), a notification pursuant to Annex 11 of the Indirect Discharger Administrative Regulation (IndirekteinleiterVwV) was submitted in 2018.

Waste is calculated as the sum of the weights of the various waste fractions collected during the year. Emissions (Scope 1 and 2 according to the GHG protocol) were calculated on the basis of electricity, heating oil and diesel fuel consumption (expressed in CO₂ equivalents; 1 kWh of electricity = 0 kg of CO₂; 1 litre of heating oil = 3.119 kg of CO₂; 1 litre of diesel = 2.639 kg of CO₂). The land consumption results from the sum of the floor areas of the respective buildings in relation to the total size of the property. The table below (on page 14) shows the input-output balance for the years 2018 to 2025.

As the reference value (figure B pursuant to EU Regulation 2018/2026), the annual total output quantity (production volume in tonnes) is used in each case, as it best reflects overall annual activity.

Production volumes were down overall after the pandemic years. This is due, on the one hand, to production shifts to the subsidiary plant in Poland and, on the other hand, to customers having heavily stockpiled disinfectants during the pandemic years. The fact that these stocks

have now largely been depleted was certainly also a reason why an increase in production volumes was recorded for the first time since the pandemic in 2024. This trend continued in 2025 and a further increase in production volumes is expected in the future.

Input-output balance for the years 2018 to 2025

Parameters	2018	2019	2020 ^c	2021 ^c	2022	2023	2024	2025
Total energy (MWh)	3.605	4.748	3.653	5.010	3.436	3.036	3.619	3.752
Total final energy according to EnEFG (MWh)	not available	not available	not available	2.991	2.224	1.733	1.859	1.773
Electricity (MWh)	772	1.283	1.398	1.253	1.027	866	887	901
Heating oil (litres)	65.789	148.572	118.269	158.663	98.874	67.896	80.607	66.065
Diesel (litres)	224.144	204.278	110.812	223.918	146.612	153.812	198.644	225.746
Energy efficiency [kWh/t product]	257	321	156	439	345	359	364	348
Energy eff. [MWh/employee]	12,0	13,7	8,7	11,9	8,1	7,9	9,4	9,2
Total share of renewable energy [%]	21,4	27,0	38,3	25,0	29,9	28,5	24,5	24,0
Mass flow (in tonnes) of								
raw materials	5.960	6.408	11.152	4.979	4.503	3.101	3.922	4.048
Merchandise	2.085	2.336	3.174	1.982	1.839	2.051	2.469	3.023
packaging materials, of which:	948	963	1.573	755	731	482	637	606
cardboard, paper	253	251	397	204	210	145	190	185
Plastic	696	712	1.176	551	521	337	447	421
Mass flow indicator ^e	0,64	0,66	0,68	0,61	0,71	0,67	0,71	0,71
Total water consumption (m³)	15.604	20.137	27.817	15.707	14.297	12.659	13.782	14.106
Total waste (t)	approx. 907	approx. 1.023	approx. 1.466	approx. 941	636	562	665	587
Paper, cardboard (150101)	69	76	105	57	61	47	70	58
Plastic (150102)	22	28	30	14	14	11	13	11
mixed Municipal waste (200301) ^a	approx. 75	approx. 125	approx. 175	approx. 120	25	20	35	34
Hazardous waste:								
laboratory chemicals (160506 ^d)	18	18	22	6	7	0	0	0
glass packaging (150110 ^d)	0	0,2	0	0	0,6	0,4	0,4	0,4
product waste (161003 ^d)	714	760	1.009	743	527	483	541	476
oil waste (130205 ^d)	0	0	0	0	2	0	9	4
wastewater ^b	not available	not available	not available	not available	6.126	5.515	5.349	5.898
Emissions (t CO ₂ , heating oil, diesel, electricity)	797	1.002	661	1.086	695	694	704	735
VOC (t)	53,1	52,4	62,8	52,5	21,6	15,0	21,2	14,1
Products (t)	13.995	14.789	23.486	11.418	9.960	8.457	9.956	10.794
Other								
Area consumption (m²)	10.000	10.000	10.000	10.000	10.000	10.000	10.000	10.000
Unsealed area (m²)	4.000	4.000	4.000	4.000	4.000	4.000	4.000	4.000
Near-natural area (m²)	6.000	6.000	6.000	6.000	6.000	6.000	6.000	6.000

^a As of 01/07/2022, the disposal of municipal waste was changed from emptying (roll container) to weighing (press container). The quantity was obtained by extrapolating the half-yearly quantity to the annual quantity. Due to the weighing, the quantity could be quantified for the first time. It turned out that the quantities of previous years were set too high.

^b Regarding wastewater meters. Since 2018, no wastewater meter has been available, as the metering station was removed in the course of the new construction project. The wastewater was not recorded separately. However, the wastewater fee is paid for all water that does not flow into the products, taking into account a wastewater surcharge in consultation with the municipality of Malsfeld. In 2021, the wastewater metering system was corrected and was under review. Since 2022, wastewater has been recorded via this metering system.

^c The basis of calculation has changed due to an increased number of employees.

^d Hazardous waste.

^e Material efficiency is calculated as the reciprocal value of the mass flow indicator.

Mass flow

The absolute mass flow has increased again compared to previous years. This is due, among other things, to the increased production figures and the increased demand for alcoholic disinfectants, which have a high proportion of chemical raw materials due to their composition. The increase in the quantities of raw materials received is also accompanied by an increase in merchandise. This reflects the fact that products for the professional market are also increasingly being manufactured at the subsidiary plant in Poland. The mass flow indicator, i.e., procurement-side goods movements in relation to production volumes, has nevertheless remained constant at approximately 0.71 compared with the previous year. Both the absolute and, in particular, the specific consumption of packaging materials – especially plastics – has decreased compared with the previous year. Here, the measures taken to optimise the weight of primary packaging materials have a direct effect.

Energy efficiency

The absolute total energy consumption in 2025 is at a level comparable to the period before the pandemic (2016–2018). This is remarkable, since in these years the new building was not, or at least not fully, completed and therefore fewer rooms and buildings had to be supplied with energy (electricity, heating oil).

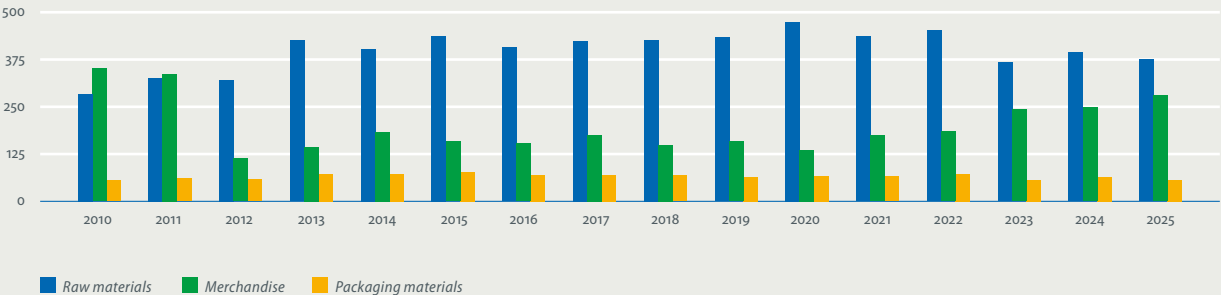
At 9.2, energy efficiency per employee is relatively constant compared with the previous year (9.4). The increased diesel consumption is primarily attributable to the intensified activities of field staff. At the same time, heating oil consumption was significantly reduced, while production volumes increased. Overall, these opposing developments mean that energy efficiency is stable overall despite changed consumption structures.

Heating oil consumption has fallen significantly compared with the previous year and is thus back at the level of the period before the pandemic. Here, the throttling of the ventilation systems and the reduction of room temperatures to the widely recommended value of 19 °C continue to have a clearly noticeable effect. In order to become independent of these external influences, opportunities should continue to be exploited to switch heat generation to renewable sources.

As mentioned, diesel consumption remains at the level before the pandemic due to the increased travel activities of field staff. The consumption of diesel fuel and heating oil has a negative effect in two respects. On the one hand, it is a non-renewable energy source and, on

Mass flow

kg/t product



the other hand, its combustion produces emissions that are harmful to the climate and human health; therefore, further minimisation of diesel fuel and/or heating oil consumption should continue to be pursued. In the long term, increased use of renewable or non-fossil energy sources is to be envisaged.

By contrast, the specific energy consumption is relatively unremarkable compared with the years prior to the pandemic, due to the still comparatively low production volumes. This is, however, understandable, as base energy consumption (such as heating of buildings) and field staff travel activities are largely independent of production volumes.

Electricity consumption has increased in proportion to the increased production volume, but remains at an overall low level. As electricity continues to be sourced entirely from renewable energy, the share of renewable energy stands at 24.0%, remaining at a consistently positive level.

We will also attempt to further reduce energy consumption in the years to come.

On 1 October 2022, the Ordinance to Safeguard Energy Supply through Medium-Term Measures (EnSimiMaV) entered into force. According to this, companies were obliged according to § 4 (1) to implement economically feasible measures, provided that the total energy consumption within the last three years averaged more than 10 GWh per year. This value was never exceeded in the company,

meaning that no measures under this regulation were required. The regulation expired on 30/09/2024.

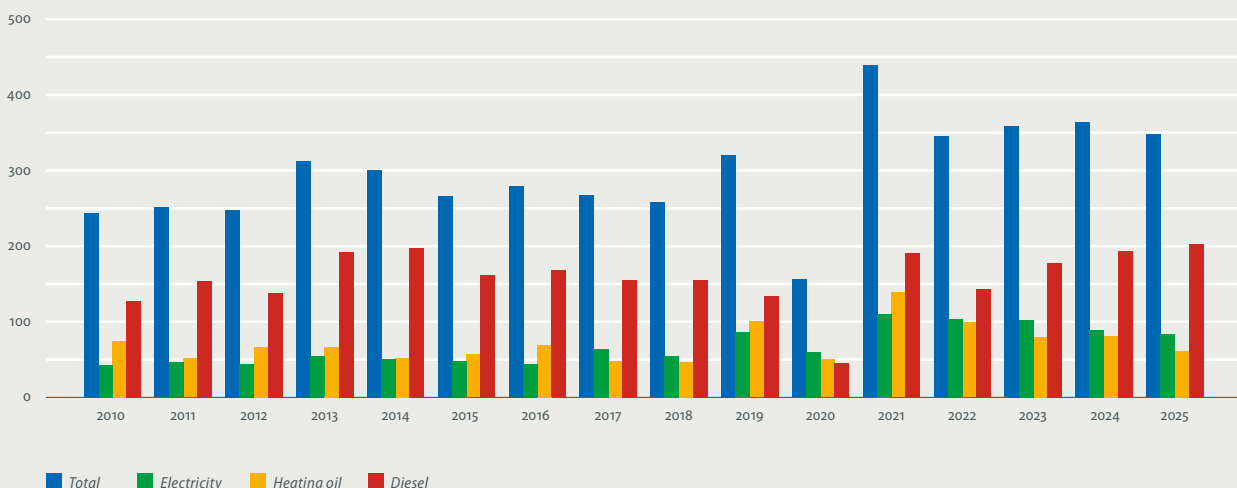
On 18/11/2023, the Energy Efficiency Act (EnEfG) came into force. According to § 8 (1) of this Act, companies are obliged to implement an environmental management system if the average total final energy consumption within the last three calendar years exceeds 7.5 GWh. Although the company's energy consumption was below 7.5 GWh, the company has voluntarily had a certified environmental management system in place since 2010.

In addition, pursuant to § 9 of the Energy Efficiency Act (EnEfG), companies with an average total final energy consumption of more than 2.5 GWh per year over the past three calendar years are required to prepare and publish concrete, feasible implementation plans for all end-energy efficiency measures identified as economically viable within a maximum period of three years.

As no onward transfer of energy takes place, these were calculated on the basis of electricity, heating oil and diesel consumption. For diesel, pursuant to § 3.3 of the BAFA guidance note on determining total final energy consumption (as of 17 July 2024), energy consumption of company cars that are also used privately may be disregarded. On this basis, the values for total final energy consumption pursuant to the EnEfG listed in the data table are calculated. The average values as at 1 January 2025 (i.e., for the years 2022–2024) amounted to 1.938 GWh and, as at 1 January 2026 (i.e., for the years 2023–2025), to 1.789 GWh, and thus in each case remained below the threshold of 2.5 GWh.

Energy consumption

kWh energy/t product



Water consumption/ wastewater

The main part of the water is required for the manufacture of the products. The absolute water consumption in the period under review, 2025, has increased in proportion to the increase in the production volume compared to 2024. The main share of the total water consumed has always flowed into the products. As the following graph shows, the efficiency of the water consumed per tonne of product remained at the level before the coronavirus pandemic.

The wastewater from water treatment accounts for the main share of the operational wastewater and will continue to be quantified in consultation with the municipality of Malsfeld. Compared with the previous year, an increase in the volume of wastewater can be seen in absolute terms, as total water consumption has increased. This is also due to the fact that more water was required for the manufacture of the products. This then also increases the amount of wastewater from the water treatment plant.

Although water is a renewable resource, abstraction from surface and groundwater affects the natural balance and flow regime. The surface water of the sealed areas is fed into the municipal wastewater, but is not recorded in terms of quantity.

Waste

We consider it an important task to reduce the volumes of waste generated by consistently exploiting all avoidance potentials and to subject the remaining waste to recovery. Disposal is associated with a variety of (indirect) environmental impacts. This concerns the emission of gases during transport and combustion that have an impact on ozone depletion in the stratosphere and on the greenhouse effect.

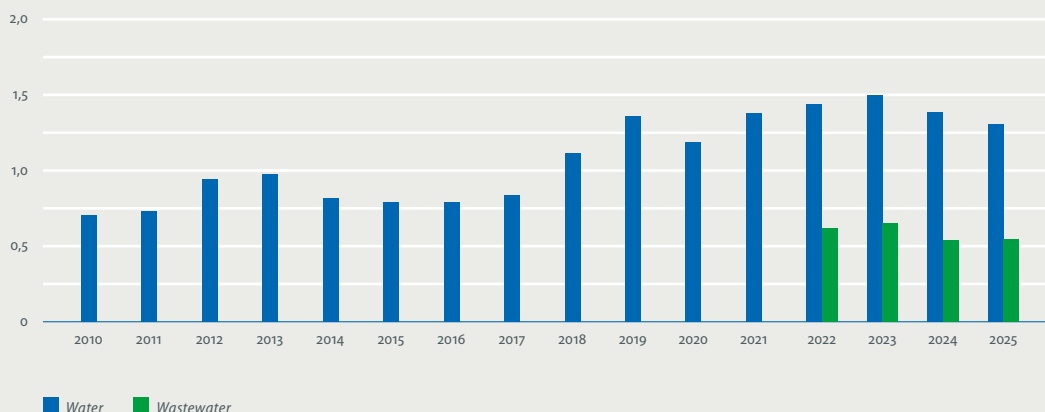
All waste is subject to extensive legal requirements with regard to its generation, storage, transport and disposal, in particular the Circular Economy Act and the ordinances issued thereunder. The resulting requirements are met.

In our company, waste arises mainly in the form of production wastewater, commercial waste similar to household waste (packaging and office waste), paper and cardboard, plastics including film, and, to a limited extent and in small quantities, scrap and electronic waste. In addition, chemical waste arises occasionally from the disposal of expired retention samples, unusable residues of raw materials, or rejected semi-finished and finished products.

The requirements of the Commercial Waste Ordinance in the version of 18 April 2017 regarding waste separation are complied with. Further separation of household waste-like commercial waste is not economically justifiable and is not possible with reasonable effort.

Water consumption/wastewater

m³ / t product



The plastic waste results mainly from plastic packaging. Plastic and film waste are sorted and recycled in accordance with § 8 paragraph 1 and § 9 paragraph 4 of the Circular Economy Act (Kreislaufwirtschaftsgesetzes).

In compliance with legal requirements, it is our intention to subject waste to recovery rather than disposal. At 17.7%, the recycling rate in 2025 was comparable to the previous year. This results from the fact that both the quantities of waste sent for recovery – particularly paper and plastic waste – and the quantities of waste sent for disposal (in particular production wastewater) have decreased. As a result, the ratio remains almost constant.

The total volume of waste in 2025 has fallen significantly compared to 2024, from 587 tonnes to 665 tonnes, and compared to previous years. This continues the long-standing trend towards generally lower waste volumes.

Due to the limited capacity of the sewage treatment plant in the municipality of Malsfeld, the production wastewater must be disposed of as hazardous waste via suitable specialist disposal companies. Corresponding individual disposal certificates are available for this. Despite increasing production volumes, the volume of production wastewater has fallen significantly by 12% and remains at a relatively low level overall.

Optimisations in production planning and rinsing processes have had a very positive effect here. In addition to the described production "wastewater" and the oil-containing wastewater, small amounts of laboratory glassware have also been generated as hazardous waste. These contain hazardous substances and were disposed of under a collective disposal certificate issued by the waste management contractor.

The amount of waste per t of product (differentiated according to hazardous and non-hazardous waste) is shown in the graph below.

Land use

Of the total site area of 18,500 sqm, approximately 10,000 sqm are developed, including the current expansion measure. As is customary with construction measures, surface sealing has an impact on the environment due to reduced water penetration into the soil and can lead to soil erosion. All construction measures are covered by permits, the associated conditions of which have been complied with. The data on near-natural and unsealed areas are based on estimates.

Waste

kg / t product



Emissions

Emissions must be minimised, as they can influence the climate via the greenhouse effect and the depletion of ozone in the stratosphere and also make an undesirable contribution to summer smog.

The statutory requirements, which are based in particular on the Federal Immission Control Act (BImSchG) and the ordinances derived therefrom, are complied with by our company. The annual notification pursuant to the 31st Ordinance under the Federal Immission Control Act (BImSchV) for the year 2025 with regard to pharmaceutical production has already been prepared and submitted on time. The requirements pursuant to the 12th BImSchV (as an upper-tier establishment) are also fulfilled.

The exhaust air from the filling machines is collected via a common stack in accordance with the successfully completed approval procedure under immission control law. The common stack was raised to a height of 24.2 m in 2024 in accordance with the new requirements of TA Luft 2021. Regular measurements are used to verify that the emission control limit values in the exhaust air are complied with in each case. These measurements were carried out in 2024 after the implementation of the gas pendulum method. In principle, compliance with the relevant limit values could be verified. However, since the measurement is not completely free of interference,

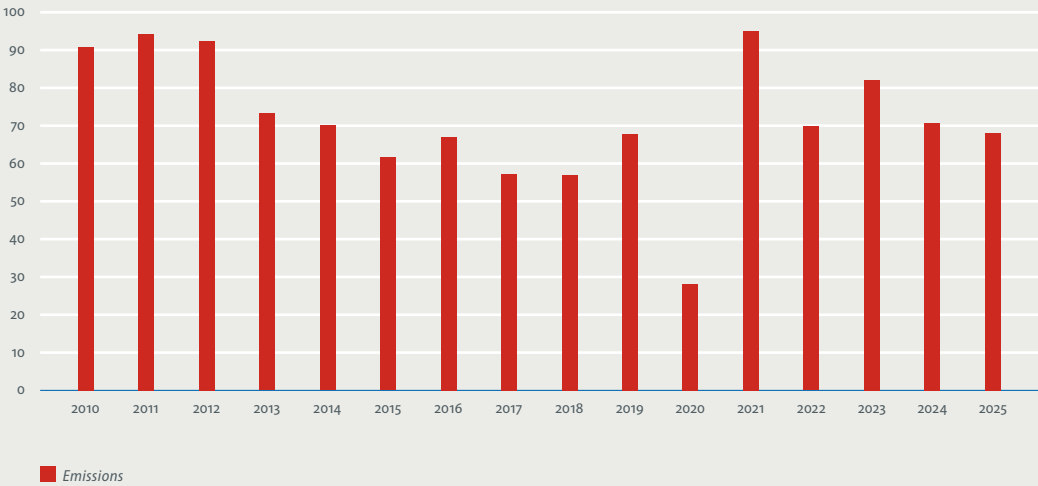
proceeded without issues, the authority set the date for the next emissions measurement for early 2026

In terms of emissions, we only consider the consumption of diesel fuel, heating oil and electricity converted into CO₂ equivalents, as no emissions of other greenhouse gases (such as methane, nitrous oxide, hydrofluorocarbonate, perfluorocarbonate) or other emissions (such as NO_x, SO₂) are generated during production. This type of emissions arises solely from motor vehicles and heating oil combustion systems, the legally compliant operation of which is verified through the inspections required by law.

Absolute emissions of CO₂ increased slightly in 2025 compared to 2024, as diesel consumption in particular also increased compared to the previous year. This could not be "compensated" for by the calculated update of the conversion factors for heating oil and diesel in CO₂. Electricity consumption has increased slightly in proportion to the production volume.

More detailed information on group-wide CO₂ emissions in the form of the Company Carbon Footprint (CCF) can be found in our CSRD sustainability report, which is also available on our website.

Emissions
kg CO₂/t product



However, due to the increased production volume, specific emissions have decreased slightly. However, as these – apart from electricity – are only weakly correlated with production volumes, this is regarded only as a calculated figure.

Emissions from VOCs have fallen by more than seven tonnes in 2025 compared to 2024. The requirements pursuant to the 31stBImSchV continue to be fulfilled. This demonstrates a responsible approach to the use of solvents.

Compliance with limit values

Compliance with the emission limit values is demonstrated by means of a solvent balance required under the 31st Ordinance to the Federal Immission Control Act (31st BImSchV). The exhaust air devices are checked regularly. In each case, it was possible to prove that the requirements were met. As described above, the immission control limit values were also complied with, as demonstrated by measurements taken at the common stack.

The sanitary wastewater is fed into the local sewage treatment plant in accordance with the municipality. Production wastewater is disposed of in accordance with the Circular Economy Act and the Waste Verification Ordinance. An appropriate disposal certificate has been prepared, and the disposal route has been approved by the competent supervisory authority. The limit values for noise pollution in the environment resulting from the building permits are complied with.

Environmental objectives and targets

We strive to minimise the consumption of raw materials, energy and water. In addition, we undertake to assess, control and reduce environmentally relevant impacts and to avoid or minimise emissions, waste, wastewater and noise. For the practical implementation of these principles, which are anchored in our company policy, we had set ourselves specific targets for the years 2025–2027. These targets serve to expand and safeguard the level achieved so far. In the following, we comment on the status of the implementation of these goals.

Environmental goals have been defined for the years **2025–2027**, the implementation of which is commented on as follows:



1. Objective

Reduction of the energy index compared to 2024 by 3%

Measures

Reduction of heating oil and diesel consumption through suitable measures such as the installation of heat recovery systems, the installation of photovoltaic systems on the roof surfaces, the optimisation of driving routes and the increased use of public transport for business trips.

Deadline

December 2027

Responsible

Management in cooperation with the Sustainability & Environment Management and ConFM.

Statement

A heat recovery system was installed in the year under review, as was a photovoltaic system. As these will not be commissioned until 2026, they could not yet have an impact on energy consumption in 2025. However, it can be assumed that this will then be noticeable from 2026 onwards. In addition, measures were implemented to optimise ventilation controls, which led to a decrease in heating oil consumption. The measures taken to reduce fuel consumption, on the other hand, have not led to a reduction in diesel consumption. The increase in diesel consumption is primarily attributable to the higher number of field staff and their increased travel activities. The use of new and more economical vehicles has slowed down the increase in diesel consumption. However, measures have been initiated here that are conducive to the implementation of the objective. Although total energy consumption increased in absolute terms from 3,619 MWh in 2024 to 3,758 MWh in 2025, in relation to the increased production volumes, there is a decrease in specific energy consumption from 364 kWh/t product to 348 kWh/t product in the annual comparison, which corresponds to a percentage decrease of 4.4%.

The set objective was thus implemented. A further reduction in specific energy consumption is targeted for the coming years.



2. Objective **Optimisation of rigid packaging from a sustainability perspective**

Measures

Material savings for bottles and canisters with the aim of reducing at least 4 tonnes of plastic material (based on the number of containers affected from 2024) at the Malsfeld site with these optimisations.

Deadline

December 2026

Responsible

Packaging development in cooperation with sustainability and project management as well as R&D.

Statement

The conversion of the 1000 ml bottle to the weight-reduced bottle (FLA-1000NA3204-03) was completed in March 2025. Based on the delivery quantity in the year under review, it was possible to save approximately 3 tonnes of plastic compared to the original variant. Extrapolated over the entire year, this results in a saving of approx. 4 tonnes of plastic. The set objective was thus implemented.



3. Objective **Implementation of software for the systematic and company-wide recording of the systems subject to inspection and the preventive monitoring measures required for this. This goal also serves to prevent accidents at work.**

Measures

Procurement of the software and integration of the various systems requiring inspection by the responsible persons with the aim of recording all systems requiring inspection in the system. To this end, regular exchange meetings will be held, which may also be combined with ASA meetings.

Deadline

December 2025

Responsible

Persons responsible for the systems subject to inspection in consultation with the occupational safety specialist.

Statement

In the reporting year, software was procured for the monitoring of the systems subject to inspection. The program has already proven itself in-house for the monitoring of test equipment in quality control and has now been adapted to such an extent that it is also suitable for these purposes. The program has been used by the responsible persons since this year. Problems have not been communicated so far.

The objective was thus implemented.

Environmental goals for 2026 to 2030

The following environmental goals have been defined for the year 2026 and the following years:



1. Objective

Reduction of the specific total energy consumption at the Malsfeld site by at least 30% compared to the value of 2021 (starting value: 439 MWh/t product, target value: 307 MWh/t product)

Measures

Reduction of heating oil and diesel consumption through appropriate measures such as optimising travel routes by using digital route planning, converting the vehicle fleet to alternative drivetrains or energy sources, and increased use of public transport for business travel or the bundling of business trips, where this is economically and permissible under labour law.

Measures such as further optimisation of ventilation systems and heat recovery are envisaged to reduce heating oil consumption.

Deadline

December 2030

Responsible

Management in cooperation with the Sustainability & Environment Management, Fleet Management and Sales or ConFM.



2. Objective

Increased use of recyclates in packaging materials, with the global objective of raising the recycled content to 15% by 2030 for contact-sensitive non-PET packaging and to 40% for non-contact-sensitive packaging made from plastic materials other than PET, provided this is compatible with the legal requirements applicable to the products.

Measures

Development of a system for recording the proportion of recycled material in the Group's packaging. At the same time, the use of recycled materials in packaging must be promoted in consultation with suppliers and, if necessary, with customers. Once a system for recording the share of recycled content has been established, concrete quantitative targets are to be defined on the path towards implementing the global objective.

Deadline

December 2030

Responsible

Packaging development in cooperation with sustainability management, product management and R&D.



3. Objective **Reduction of occupational accidents (reportable and non-reportable, without minor and near misses) per million working hours from 10 (in 2021) to < 1**

Measures

Promotion of safety officers, regular workplace inspections, intensification of awareness-raising with regard to dealing with potential and actual sources of danger.

Deadline

December 2030

Responsible

Managers in the commercial sector in consultation with the occupational safety specialist.



4. Objective **Group-wide implementation of a Zero Trust model to minimise lateral movement attacks and enhance overall resilience beyond statutory requirements.**

Measures

Establishment of complete network micro-segmentation, stronger identity verification based on risk indicators, continuous multi-factor authentication for internal and external access.

Start

from mid-2026

End

2030

Responsible

IT Security / Information Security Officer / IT Administration

Declaration of validity – see page 29

Declaration of validity

Declaration by the environmental expert on the verification and validation activities

The
Environmental Expert
Dipl.-Ing. Henning von Knobelsdorff
Mozartstrasse 44
53115 Bonn,
Germany

has audited the environmental management system, the updated
environmental statement of

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Registration number: DE-139-00093

NACE codes 20 & 21: "Chemicals and manufacture of pharmaceutical products" for compliance with Regulation (EC) No. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation of organisations in a Community eco-management and audit scheme, as amended by Regulations (EU) 2017/1505 and (EU) 2018/2026, and declared the present environmental statement to be valid.

By signing this declaration, it is confirmed that

- the assessment and validation have been carried out in full compliance with the requirements of Regulation (EC) 1221/2009 in conjunction with Regulation (EU) 2017/1505 and Regulation (EU) 2018/2026,
 - there is no evidence of non-compliance with the applicable environmental regulations,
 - the data and information in the updated environmental statement for the above site, with approximately 385 employees in the area assessed, provide a reliable, credible and truthful picture of all activities at the site within the area specified in the environmental statement.
- The next consolidated environmental statement will be submitted to the registration office by 15 February 2028 at the latest.

This declaration cannot be equated with an EMAS registration. The EMAS registration can only be carried out by a competent body in accordance with Regulation (EC) No 1221/2009.

This declaration may not be used as a stand-alone basis for informing the public.

26 January 2026

Henning von
Knobelsdorff
Environmental Expert

Environmental Expert Dipl.-Ing. Henning von Knobelsdorff
Certification of Management Systems

Gültigkeitserklärung

Erklärung des Umweltgutachters zu den Begutachtungs- und Validierungstätigkeiten

**Der
Umweltgutachter
Dipl.-Ing. Henning von Knobelsdorff
Mozartstraße 44
53115 Bonn**

hat das Umweltmanagement-System, die aktualisierte Umwelterklärung der

Dr. Schumacher GmbH

Am Roggenfeld 3

34323 Malsfeld

Registriernummer: DE-139-00093

NACE Code (20 & 21) „Chemie und Herstellung von pharmazeutischen Erzeugnissen“ auf Übereinstimmung mit der Verordnung (EG) 1221/2009 des Europäischen Parlaments und des Rates vom 25. November 2009 über die freiwillige Beteiligung von Organisationen an einem Gemeinschaftssystem für das Umweltmanagement und die Umweltbetriebsprüfung mit den Ergänzungen VO (EU) 2017/1505 und VO (EU) 2018/2026 geprüft und die vorliegende Umwelterklärung für gültig erklärt.

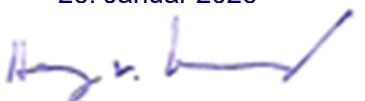
Mit der Unterzeichnung dieser Erklärung wird bestätigt, dass

- die Begutachtung und Validierung in voller Übereinstimmung mit den Anforderungen der Verordnung (EG) 1221/2009 i.V.m. VO (EU) 2017/1505 und VO (EU) 2018/2026 durchgeführt wurden,
- keine Belege für die Nichteinhaltung der geltenden Umweltvorschriften vorliegen,
- die Daten und Angaben der aktualisierten Umwelterklärung des o.b. Standortes mit ca. 385 Mitarbeitern im begutachteten Bereich, ein verlässliches, glaubhaftes und wahrheitsgetreues Bild sämtlicher Tätigkeiten des Standortes innerhalb des in der Umwelterklärung angegebenen Bereiches geben.

Die nächste konsolidierte Umwelterklärung wird der Registrierstelle spätestens bis 15. Februar 2028 vorgelegt.

Diese Erklärung kann nicht mit einer EMAS-Registrierung gleichgesetzt werden. Die EMAS-Registrierung kann nur durch eine zuständige Stelle gemäß der Verordnung (EG) Nr. 1221/2009 erfolgen. Diese Erklärung darf nicht als eigenständige Grundlage für die Unterrichtung der Öffentlichkeit verwendet werden.

26. Januar 2026



Henning von Knobelsdorff
Umweltgutachter
DE-V-0090

Umweltgutachter Dipl.-Ing. Henning von Knobelsdorff
Zertifizierung von Managementsystemen

Contact

Dr. Schumacher GmbH
Am Roggenfeld 3
34323 Malsfeld
Germany
P +49 5664 9496-0
F +49 5664 8444
info@schumacher-online.com
www.schumacher-online.com

