

Inspiring People
to Build Better
Sustainability Report 2024



Welcome to our 2024 Sustainability Report



Today, sustainability is not just a business imperative – it is a global necessity. As construction faces growing environmental and social challenges, building more sustainably is essential for a better future. That is why it sits at our core and guides how we operate and collaborate across the value chain.

We advance more sustainable construction by reducing the environmental impact of concrete production without compromising performance. Built on years of research and innovation, our products and services help customers reduce emissions and waste, while creating durable infrastructure that meets the needs of growing populations for more sustainable living and working conditions.

In 2024, continued progress against our climate goals reduced our scope 1 and 2 CO₂e emissions per tonne by 10.8% compared to our 2020 baseline. Our first double materiality assessment laid the foundation for future ambitions. We also completed our first standalone EcoVadis rating, achieving Gold – demonstrating our strong sustainability performance and transparency.

Our business is founded on a strong safety and ethics culture that empowers our people to do their best work. Our 2024 Global Safety Day reinforced our commitment to uphold safety every day. Continuous training on our Code of Conduct and other

compliance matters supports all employees to understand and adhere to our high expectations.

As you explore this report, I invite you to discover how our people, culture, and governance are driving meaningful change – and how together, we are building a more responsible and resilient future.

Dr. Boris Gorella, CEO and Chairman of the Board of Management

I am proud to present the first Master Builders Solutions Sustainability Report voluntarily aligned with the European Sustainability Reporting Standards (ESRS). This milestone reflects our growing maturity in ESG reporting and commitment to leading frameworks.

This report goes beyond numbers, reflecting how we embed sustainability into our governance, operations, and culture. By strengthening our internal systems, engaging our people, and aligning with global standards, we are building a more sustainable organisation. I welcome your ongoing dialogue and feedback.

Dr. Shirin Fataei, Head of Sustainability



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Our reporting approach

Master Builders Solutions is a leading manufacturer of concrete admixtures and other advanced chemical solutions for the construction industry, with more than 7,800 customers, 37 production sites and ~1,800 employees globally.

Our 2024 Sustainability Report shares a detailed view of our approach and progress in managing the material sustainability topics for our business and value chain. It reflects the current version of the European Sustainability Reporting Standards (ESRS), which provides a robust framework to disclose environmental, social, governance, and other company-specific sustainability information. In 2024, we are voluntarily applying the ESRS framework, reinforcing our commitment to thorough and transparent sustainability reporting. This report has not been subject to limited assurance.

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This chapter outlines our approach to sustainability reporting and describes how we integrate sustainability into decision making across our business. It provides an overview of who we are, the sustainability-related benefits of our products and services, and how we engage with our key stakeholders. We also summarise our 2024 double materiality assessment process and results, which underpin the environmental, social, and governance (ESG) disclosures in the following chapters.



Basis for preparation

Scope ESRS 2: BP-1

The information and data included in the Master Builders Solutions 2024 Sustainability Report are reported on a consolidated basis and cover the same entities as in our 2024 financial statements (see the entities listed on [page 56](#)) unless otherwise stated.

The report primarily focuses on our own operations and workforce, in line with the results of our double materiality assessment (read more on [page 16](#)). Information on our policies, actions, and targets related to our value chain relationships – for example with suppliers and customers – is included under topic-specific disclosures where deemed material and useful.

Scope changes from previous reporting periods

We acquired two additional entities in 2024, expanding the scope of our reporting since the previous reporting period (FY2023):

- 1. Adril Traders S.L. (joined May 2024).** Environmental, social, governance (ESG) and financial data are available and included in this report.

- 2. MBT Teknik Yapı Kimyasalları Sanayi ve Ticaret Anonim Şirketi (joined December 2024).** Environmental data are omitted, as the entity joined Master Builders Solutions Group in December 2024. Social, governance and financial data from December 2024 onwards are included in this 2024 report.

In addition, since our previous report, we expanded our business to **Mexico (May 2024), India (August 2024), and Brazil (November 2024)**. Social, governance, and financial data from these new regions are included in this 2024 report. Environmental data are omitted, as local production did not occur in any of these locations in 2024. We plan to integrate data from all these entities into our next reporting cycle.

Reporting approach ESRS 2: BP-2

Time horizons

We defined our impacts, risks and opportunities detailed in this report in line with the European Sustainability Reporting Standards (ESRS) time horizons, as outlined below.

Short term	Medium term	Long term
Equivalent to the reporting period in our financial statements (one year).	Up to five years.	More than five years.

[Data estimation and corrections](#)

Regarding environmental data, we apply common assumptions to calculate our scope 1, 2, and 3 greenhouse gas (GHG) emissions data, such as using external databases, work from home to office work ratio assumptions, and spend-based methodology.

We are implementing an ESG software platform to continue to improve our data audit and control capabilities. In 2025, we recalculated our 2023 scope 1, 2, and 3 emissions through this new platform. This resulted in a slight change to our reported 2023 emissions data, and means we have more accurate information moving forward. Read more on [page 61](#).

Our social, governance, and financial data are calculated from direct, internal data and therefore do not rely on estimation.

[Additional voluntary disclosures](#)

The Additional disclosures ([page 55](#)) chapter of this report includes supplementary information to enhance understanding of our business context and sustainability performance. These voluntary disclosures are consistent with the Global Reporting Initiative framework and our previous sustainability report.

Corporate governance

Board composition and expertise ESRS 2: GOV-1

The main supervisory bodies overseeing Master Builders Solutions’ business and sustainability performance include the Supervisory Board and the Board of Management.

Supervisory Board composition	2024
Executive vs. non-executive	
Executive	0 (0%)
Non-executive	4 (100%)
Gender breakdown	
Female	1 (25%)
Male	3 (75%)
Affiliate vs. independent	
Affiliate	3 (75%)
Independent	1 (25%)
Total	4 (100%)

Board of Management expertise

The Board of Management includes our Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Operating Officer (COO), and Chief Transformation Officer (CTO). Together, they bring extensive, diverse expertise, including:

- Dr. Boris Gorella**, our **CEO**, has a multi-decade career, with notable roles including CEO of Pfeiderer Group and Beckers Group. He previously served as head of a major BASF Construction Chemicals Business Unit in Asia Pacific and President of Degussa Construction Chemicals Business Unit in Asia, where he played a key role in the company's expansion. Has also worked with KKR and McKinsey, holding an MBA from INSEAD and a PhD in chemistry from TU Berlin.
- Christian Hammel**, our **CFO**, brings more than 30 years of experience in business transformation across corporate and private equity environments. He previously served as CFO at several global organisations, where he led major mergers and acquisitions activities, drove strategic execution, managed change initiatives, and implemented performance improvement programmes. He holds a Bachelor of Commerce in Finance and Banking and a Bachelor of Commerce in Accounting and has completed executive leadership programmes at IMD and INSEAD.
- Dr. Karsten Eller**, our **COO**, has more than 30 years of experience in the chemicals industry, having previously held management positions within the Construction Chemicals business at Degussa and BASF, and served as COO of Beckers Group for over 10 years. He holds a PhD in Chemistry from TU Berlin and completed a post doctorate in chemistry at Yale University.
- Leading strategic initiatives to foster company growth and expansion **Dr. Julian Horstkotte**, our **CTO**, previously held the same role at MBCC Group. He has more than a decade of experience in the building materials sector and has served as a Partner for 10 years at Boston Consulting Group. He holds a Ph.D. in Business Administration from WHU – Otto Beisheim School of Management.

Board of Management composition	2024
Executive vs. non-executive	
Executive	4 (100%)
Non-executive	0 (0%)
Gender breakdown	
Female	0 (0%)
Male	4 (100%)
Age breakdown	
<30 years old	0 (0%)
30-50 years old	1 (25%)
>50 years old	3 (75%)
Total	4 (100%)

Sustainability governance ESRS 2: GOV-2, GOV-3, GOV-4

The Governance section of our global ESG Policy defines roles, responsibilities, and accountability for ESG performance management and the frequency of governance meetings.



IRO oversight

Senior executives are responsible for all Master Builders Solutions' material sustainability-related impacts, risks and opportunities (IROs), including:

Material IRO category	Environment (climate, water, biodiversity, circularity)	Working conditions	Employee privacy
	Health & safety	Equal treatment & opportunity	Anti-corruption & anti-bribery
		Worker rights	
		Corporate culture	
Senior executive responsible for oversight	COO	Chief Human Resources Officer	CFO

Global team leads report to these senior executives on the relevant topics. For example, Group Compliance reports to our CFO on matters relating to anti-corruption and anti-bribery. The team leads verify that Master Builders Solutions' policies and procedures cover business needs, support proper conduct, fulfil local and global regulations and mitigate potential risks and negative impacts. They prepare the relevant policies, procedures and actions, and support local entities, which are managed regionally by regional leads.

Sustainability-related performance and incentive schemes ESRS 2: GOV-3

In 2024, remuneration for our Board of Management was linked to improving their team employee net promoter score (eNPS). The eNPS indicates how likely these employees are to recommend Master Builders Solutions as a good place to work and is calculated through our Global Management Surveys (read more on [page 35](#)). In 2024, 10% of remuneration of Board of Management was variable based on performance against the target to increase the eNPS by 10 points from 2023 to 2024.

Sustainability due diligence ESRS 2: GOV-4

We disclose sustainability due diligence information, describing how we identify and manage material sustainability IROs across our value chain, throughout this report. In Sustainability governance ([pages 8-9](#)), we outline our overarching approach to IRO oversight. In Double materiality assessment ([pages 16-19](#)), we define our material IROs and how we identified them. More detailed, topic-specific due diligence information can be found in the relevant topic sections – see the Topic-specific content disclosures index on [pages 19-20](#).

Risk management and internal controls related to sustainability reporting ESRS 2: GOV-5

In May 2024, our Group Sustainability team conducted our first abstract risk assessment across our global business units¹ based on country and industry risks, using a third-party risk assessment platform. This assessment, covering 97% of our operations, aimed to identify potential risks and areas for improvement across key ESG categories, including environmental protection, human rights and labour practices, and ethical conduct. The improvement areas and initiatives included:

- Integrating an ESG data gathering and monitoring software to streamline data collection, enhance reporting transparency, and ensure compliance with regulations.
- Transitioning to an in-house GHG inventory connected to our enterprise resource planning data and ESG software to enable real-time monitoring and proactive management of GHG emissions.
- Conducting a double materiality assessment (read more on [page 16](#)) according to the Corporate Sustainability Reporting Directive regulations to evaluate the impact of financial and non-financial factors on our operations and stakeholders.

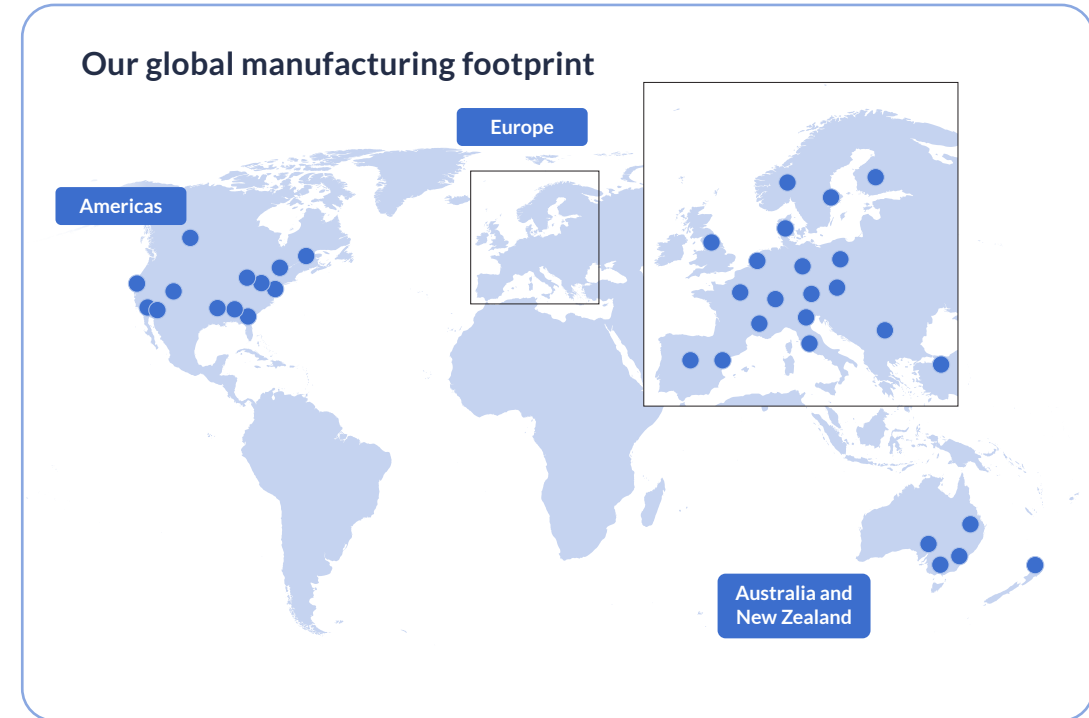
Our Group Compliance team also gathered and reviewed risks associated with every function, including sustainability-related risks. Our double materiality assessment (read more on [page 16](#)) and subsequent sustainability disclosures are aligned with the results of this Group-wide risk assessment.

¹ This risk assessment included all production sites and offices excluding Adril Traders S.L. and MBT Teknik Yapı Kimyasalları Sanayi ve Ticaret Anonim Şirketi.

Strategy

Who we are ESRS 2: SBM-1, SBM-2

Master Builders Solutions supports the construction industry to address one of today’s biggest building challenges – reducing the CO₂e emissions associated with concrete production. We are a leading global manufacturer of concrete admixtures and other advanced chemical solutions for the construction industry, providing products and technical services that support our customers to reach their sustainability goals. We operate under our four core brands – Master Builders Solutions, Fabpro Polymers, Bluey Technologies and Adril Traders.



~1,800
employees

+7,800
customers

+€880m
net sales

Products and services

Concrete production varies significantly by region — influenced by regulation, climate, and the availability of raw materials. Master Builders Solutions custom designs admixture compositions to meet the specific needs and local requirements of our thousands of customers across the globe.

Our products and services enhance the performance, durability, and sustainability of concrete and construction processes. They span a variety of applications, from ready-mix and precast concrete to underground construction and concrete repair.

- **Concrete admixtures.** Essential for all forms of concrete, including ready-mix, precast, and sprayed concrete. Concrete admixtures reduce cement content and water use, enhance durability, and control hydration, resulting in stronger, more workable concrete with up to 50% lower embodied carbon. We work closely with our customers to develop the optimal admixture for their specific concrete mix, ensuring the right balance of strength, workability, and setting time while increasing cost efficiency and reducing negative environmental impacts.
- **Cement additives.** Increase the efficiency of grinding cement, reducing energy consumption and allowing more clinker to be replaced with supplementary cementitious materials (SCMs). SCMs are ingredients added to concrete mixes to reduce cement or clinker content, reduce permeability, and influence other properties such as strength and hardening. This lowers the overall carbon footprint of cement.
- **Underground construction solutions.** For safe, reliable, and cost-efficient mining and tunnelling. Our portfolio includes admixtures for sprayed concrete and ground support for mining and tunnelling, as well as chemical and cementitious grouting, rock bolting solutions for ground stabilisation, and mine backfill technologies.
- **Fiber reinforcements.** An alternative to steel mesh, enabling partial or complete substitution of steel reinforcement. This enhances the durability of concrete structures by offering better crack control capability. Fiber reinforcement is suitable for various applications, including ready-mix, precast, and sprayed concrete.
- **Construction systems.** Including products for concrete repair and protection, performance flooring, grouts, sealants, adhesives, and waterproofing. Sold mostly across Australia and New Zealand, the range includes performance grouts required in the construction of wind turbines.
- **Technical expertise.** Through our technical services, we support customers to identify the most appropriate solution for each construction project and overcome technical difficulties in production. We conduct lifecycle assessments to evaluate the environmental effects of a single product or process and develop environmental product declarations — voluntary labels with verified environmental information. We also provide digital tools, such as MasterAtlas™, which enables analysis of concrete production, transportation, and returned volumes data, supporting resource efficiencies, including CO₂e emissions reductions. Our ECO²NOW tool estimates the cost and emissions associated with concrete formulations, showing customers the real time economic and environmental benefits of optimising concrete composition using our admixtures.

Sustainable construction with our key products

<p>MasterCO₂re®. Admixtures based on Intelligent Cluster Systems technology, which releases polymers over time to deliver effects precisely when required. This optimises the workability and hydration kinetics of the cement, adapting to the different characteristics of both cement and the SCM.</p>	<p>Durability ↑ Water use ↓ Carbon footprint ↓</p>	<p>MasterSuna® RCA and SBS. Water reducing admixtures enabling the use of recycled aggregates or low-spec sand (clay contaminated, crushed recycled aggregates) in concrete – supporting circularity and reducing use of natural resources.</p>	<p>Recycled content ↑ Water use ↓</p>
<p>MasterEase®. A family of advanced superplasticisers helping produce concrete with lower viscosity and improved workability. Benefits can include enhanced pumpability, water reduction, strength enhancement, ease of placing and finishing, and a reduced carbon footprint when using increased amounts of SCM.</p>	<p>Durability ↑ Water use ↓ Carbon footprint ↓</p>	<p>MasterSuna® RCT. Used to treat unused fresh concrete and turn it into reusable aggregates, eliminating the requirement for on-site concrete crushing or landfill disposal.</p>	<p>Resource use ↓</p>
<p>MasterFiber®. Polymer and steel fibers which enhance the performance and service life of concrete, ranging in size from 0.018 mm-diameter microfibers to 1.0 mm-diameter macrofibers.</p>	<p>Durability ↑ Carbon footprint ↓</p>	<p>MasterSphere®. Superabsorbent polymers to enable the production of freeze-thaw resistance of concrete.</p>	<p>Durability ↑</p>
<p>MasterLife®. A range of products including shrinkage reducers, corrosion inhibitors, or waterproofing admixtures – increasing concrete durability and service life, and reducing potential concrete maintenance.</p>	<p>Durability ↑</p>	<p>Master X-Seed® and Master X-Seed® STE. Hardening accelerators that allow customers to reduce cement content, switch to lower-carbon cement, enable a higher proportion of SCM, and reduce the need for heat curing with no loss of productivity.</p>	<p>Carbon footprint ↓</p>

Sustainability strategy

Our four-pillar sustainability strategy guides us to continually improve the way we operate, while supporting our customers to build better. The **Products and Services** pillar focuses on delivering high-quality solutions that support our customers to reduce their environmental impacts while meeting their quality, safety, and durability needs. It is supported by our **Climate and Environment**, **People**, and **Business Integrity** pillars, which focus on how we need to operate to achieve sustainable business success with our key stakeholders and the planet in mind.



Focus on innovation

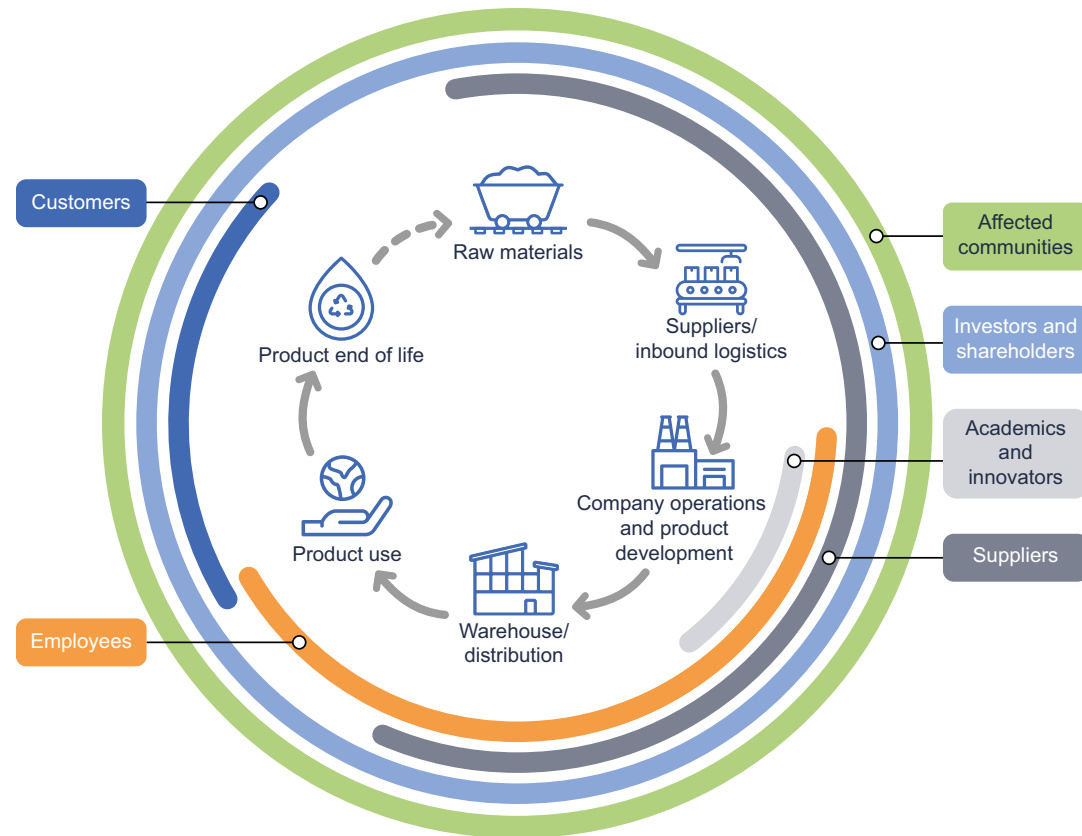
Through our longstanding dedication to innovation, we continue to deliver solutions that meet our customers' evolving needs and reflect ever-changing industry context. Strategic investment in research and development (R&D) is critical to pioneer solutions that will support our industry to decarbonise and shift to a more circular model that does less harm to biodiversity and ecosystems.

We currently have 77 R&D projects in the pipeline, and in 2024, 54% of our R&D spend was allocated to projects that enable more sustainable construction.¹ We focused on improving concrete properties while simultaneously lowering the amount of Portland cement. As the production of Portland cement is responsible for ~8% of global CO₂e emissions, our investment in R&D can play an important role in reducing emissions across the construction industry.

¹ We define projects that enable sustainable construction as those that support concrete producers to optimise their carbon footprint, increase the life span and reduce the maintenance requirements of concrete structures, focus on the substitution of scarce raw materials or the replacement of hazardous raw materials, and / or contribute to a circular economy (e.g. using recycled materials for production).

Value chain stakeholders

Our value chain spans raw material suppliers through to direct and indirect customers in the wider construction industry, such as architects, engineers, and contractors. Key stakeholder groups across our value chain include:



Stakeholder engagement

Employees

Purpose of engagement

Our people are central to our success. We seek to support their wellbeing and development, and share our expectations of performance and conduct.

Key channels to engage

- Regular trainings and seminars
- Regular townhall sessions
- Annual continuous performance management reviews
- Third-party SpeakUp platform

How we take outcomes into account

- Results from employee surveys and feedback during townhall sessions are analysed to identify recurring concerns or improvement areas. These insights are then used to shape internal practices, adjust leadership communication, or launch targeted initiatives.
- Insights gathered through training sessions, performance reviews, and compliance channels feed into broader workforce development strategies. This includes refining learning content, updating managerial expectations, and alignment with employee needs and organisational goals.

Customers

We serve customers across the concrete value chain from cement manufacturers to concrete producers, applicators, and contractors. We provide consultancy services to architects, engineers, and investors, advising on more sustainable options.

- Meetings with individual customers
- Local client satisfaction surveys
- Third-party SpeakUp platform

- We quantify potential CO₂e reductions through the use of our products and know-how to be able to provide this data to customers.
- The results of our local client satisfaction surveys are analysed and action plans developed accordingly.

Stakeholder engagement (continued)

Suppliers	Investors and shareholders	Affected communities	Academics and innovators
Purpose of engagement			
We engage in open dialogue with our suppliers to mitigate environmental and social risks. Together, we seek to strengthen human rights and environmental practices, while reliably delivering high-quality products and reducing our combined footprint.	Engagement with investors and shareholders keeps us focused and accountable, ensuring we meet external financial, environmental, and social performance expectations.	We offer open communication with local communities to support them to share their ideas and concerns.	We develop partnerships with academics, innovators, and industry partners to support access to the relevant know-how to meet future product needs.
Key channels to engage			
<ul style="list-style-type: none"> Meetings with individual suppliers Risk assessment and self-assessment questionnaire Third-party SpeakUp platform 	<ul style="list-style-type: none"> Regular business review meetings Biannual sustainability deep dive with supervisory board Third-party SpeakUp platform 	<ul style="list-style-type: none"> Locally-led community initiatives and actions Third-party SpeakUp platform 	<ul style="list-style-type: none"> Partnerships with universities Attending university Career Days
How we take outcomes into account			
<ul style="list-style-type: none"> Supplier assessments and audits guide procurement and improvement plans, including corrective actions and sustainability-focused sourcing. Feedback from engagement and the SpeakUp platform informs due diligence and updates to our Supplier Code of Conduct. 	<ul style="list-style-type: none"> Feedback from biannual sustainability deep dives with the advisory board is used to define ESG priorities, adjust sustainability targets, and guide investment in key initiatives. 	<ul style="list-style-type: none"> Dialogue with local communities builds trust and supports our company reputation. We respond to information and engagement needs and adjust our approach as appropriate. 	<ul style="list-style-type: none"> Several partnerships are formally established with universities all around Europe and North America ensuring our involvement in the development of new technologies. Master Builders Solutions is a founder and sponsor of the Concrete Industry Management programme established in universities in the US to prepare the next generation of Concrete Industry professionals.

Double materiality assessment

Material topics ESRS 2: SBM-3

Through our 2024 double materiality assessment, we deepened and updated our understanding of the sustainability topics most important and relevant to our business. The resulting material impacts, risks and opportunities (IROs) are summarised in the table below. Read more about our double materiality assessment methodology and process on [page 18](#).

	I / R / O	+ / -	Time horizon	Value chain location
Climate (read more on page 22)				
Physical climate risks affecting raw material availability.	Risk (physical)	⊖	Long	📍
Higher demand for products enabling low-carbon concrete production.	Opp.	⊕	Medium	📍
Increased procurement costs due to supplier engagement & transition efforts.	Risk (transition)	⊖	Medium	📍

	I / R / O	+ / -	Time horizon	Value chain location
Reduced energy costs through photovoltaic (PV) installation and implementation of more energy reducing measures.	Opp.	⊕	Long	📍
Products enabling low-carbon concrete production. ¹	Impact (actual)	⊕	Medium	→
Water (read more on page 28)				
Consumption of significant amounts of water for different purposes.	Impact (actual)	⊖	Short	📍
Risk of water supply disruptions on production facilities.	Risk	⊖	Medium	📍
Increasing demand for our innovative admixtures with water-reducing capabilities.	Opp.	⊕	Long	→
Biodiversity (read more on page 31)				
Impacts on biodiversity throughout the entire value chain.	Impact (actual)	⊖	Short	← →

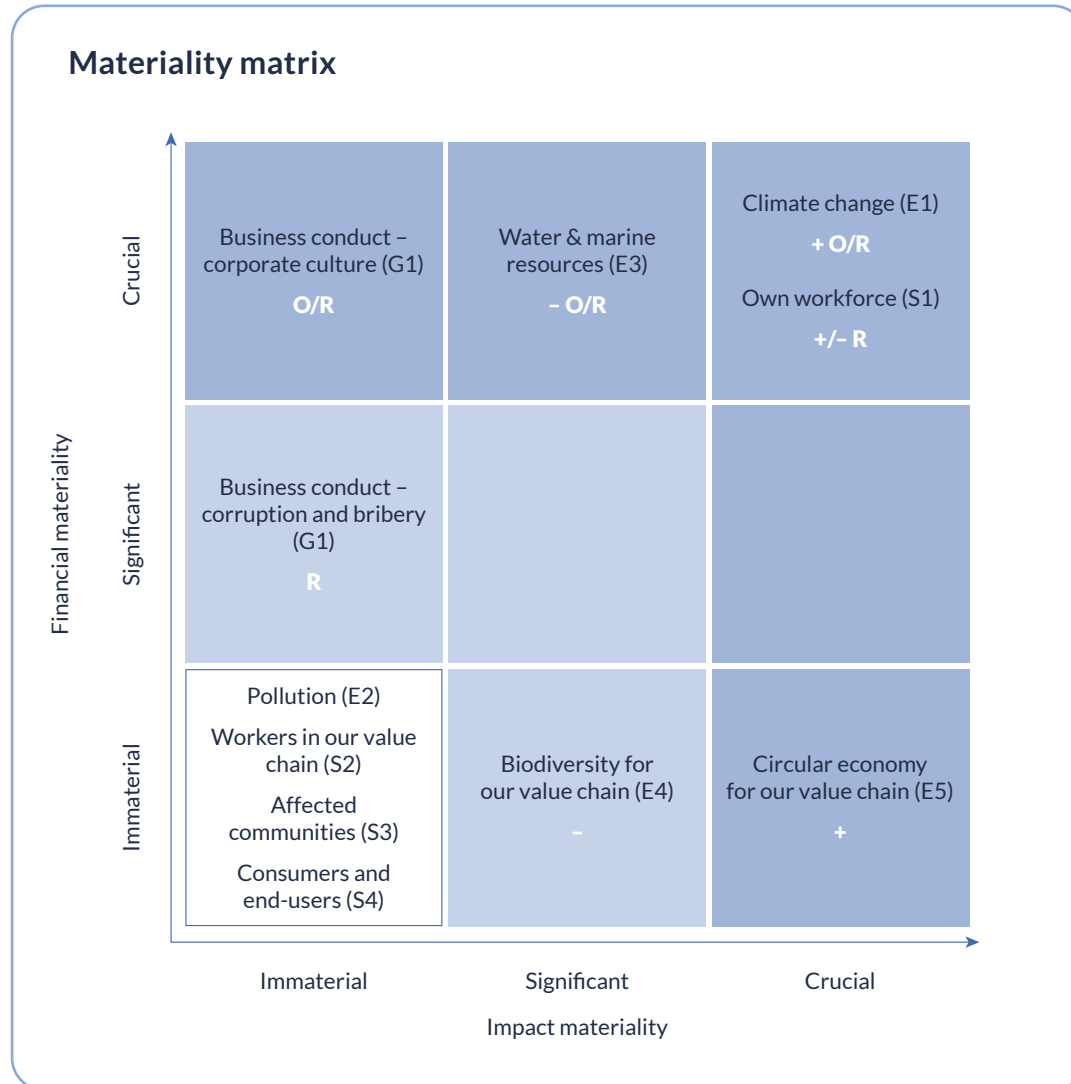
Value chain location: ← Upstream; 📍 Own operations; → Downstream

¹ Compared with conventional solutions according to [Getting to net-zero, Global Cement and Concrete Association](#) and Master Builders Solutions projects' outcomes.

	I / R / O	+ / -	Time horizon	Value chain location
Circularity (read more on page 32)				
Use of higher content of recycled aggregate in concrete production.	Impact (actual)	⊕	Short	→
Transformation of returned concrete waste into reusable materials in other applications.	Impact (actual)	⊕	Short	→
Waste reduction measures at direct customers (concrete producers).	Impact (actual)	⊕	Short	→
Own workforce (read more on pages 38, 41, 42, 45-47)				
Different measures in place to support employees' health and safety.	Impact (actual)	⊕	Short	📍
Potential workforce injuries or fatal accidents.	Impact (potential)	⊖	Short	📍
Associated risks of a high-consequence injury or fatality.	Risk	⊖	Long	📍
Secure employment with wages exceeding living wage thresholds.	Impact (potential)	⊕	Long	📍
Implementing additional measures to improve diversity and inclusion.	Impact (potential)	⊕	Medium	📍

	I / R / O	+ / -	Time horizon	Value chain location
Increasing costs and risk of disruptions to operations due to skilled labour shortages.	Risk	⊖	Long	📍
Training of employees spanning multiple themes.	Impact (actual)	⊕	Short	📍
Associated risks of scandals involving child or forced labour.	Risk	⊖	Long	📍
Presence of guidelines, policies and tools to protect employee data.	Impact (actual)	⊕	Short	📍
Failure to implement or maintain effective safeguards of employees' personal data.	Impact (potential)	⊖	Short	📍
Business conduct (read more on pages 50-53)				
Increase in employee retention due to improved corporate culture.	Opp.	⊕	Long	📍
High turnover rates, reduced employee morale, and difficulty in attracting top talent.	Risk	⊖	Long	📍
Reputational damage and fines stemming from corruption and bribery incidents.	Risk	⊖	Long	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream



Double materiality assessment process ESRS 2: IRO-1

We engaged stakeholders across our full value chain to conduct our ESRS-aligned double materiality assessment process and develop a holistic view of Master Builders Solutions’ material IROs. This included five key phases:

- 1. Shortlist of relevant sustainability topics.** Using the ESRS guidance, extensive internal business knowledge and materials, and external reports and guidance, we compiled a shortlist of relevant sustainability topics for assessment in the next phases.
- 2. Identify potential IROs.** Using the resources mentioned in phase 1, we mapped key activities across our full value chain (upstream, own operations, and downstream) and defined the potential IROs, including time horizons, for each area. Read more about our value chain on [page 14](#).
- 3. Survey different stakeholder groups.** To assess the relevance of each IRO, we developed a set of internal and external stakeholder surveys, tailored to different groups based on their sustainability knowledge and area of expertise. We assessed all IROs identified in phase 2 through the survey, applying the ESRS criteria for actual positive impacts (scale and scope), actual negative impacts (scale, scope, and irremediability), potential positive impacts (scale, scope, and likelihood), potential negative impacts (scale, scope, likelihood, and irremediability), and risks and opportunities (magnitude and probability).

4. Interview executives to further test the results. We interviewed senior stakeholders to test and validate the outcome of the survey. They were selected for their ability to provide strong insights into Master Builders Solutions’ strategy and valuable perspectives on the company’s sustainability position within our industry. Each interviewee had a unique area of sustainability expertise, offering a well-rounded view of perceived sustainability priorities.

5. Evaluate the collective stakeholder input. Combining the qualitative perspectives from interviews with quantitative survey response data (see methodology below), we analysed the results to develop a materiality matrix and our final list of material IROs.

[Results calculation method](#)

This process involved aggregating survey responses, calculating average survey scores, quantifying interviewee input and integrating interview scores into overall results. We applied statistical methods to determine the variability and reliability of the survey responses, including the calculation of standard deviations and coefficients of variation. We established thresholds to distinguish between material and non-material sustainability matters, ensuring that our evaluation accurately reflects the most critical IROs for Master Builders Solutions.

Topic-specific disclosures

We conducted our 2024 double materiality assessment in line with the ESRS at the sub-subtopic level, providing a clear rationale for including or excluding specific ESRS data points. Where we have excluded or limited ESRS-required information on a material topic, we disclose this in the relevant section.

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This chapter covers our approach and 2024 progress in managing our material impacts, risks and opportunities related to the environment. It focuses on climate change and water – key areas in which we can reduce our environmental footprint by improving our own operations and developing innovative, lower-impact solutions for customers. We also outline our evolving approach to monitoring biodiversity and circularity as these topics become increasingly important to us through our value chain relationships.



Climate

Our products and services support our customers to reduce their emissions and decarbonise the construction sector, representing our most significant opportunity to contribute to global efforts to address the climate crisis. Beyond investing in R&D to continually improve the sustainability-related benefits of our solutions, we address climate and energy-related impacts, risks and opportunities (IROs) within our own operations. Our double materiality assessment revealed the following material IROs:

Material impacts, risks and opportunities related to climate	I / R / O	+ / -	Value chain location
Physical climate risks affecting raw material availability. Physical climate risks, such as extreme weather events and changing climate patterns, can significantly impact the availability of raw materials. These disruptions can lead to increased financial costs for businesses, including higher prices for scarce resources and potential delays in production timelines.	Risk (physical)	⊖	📍
Higher demand for products enabling low-carbon concrete productions. Changes to the EU Emissions Trading System and legislative carbon budgets per project are driving increased demand for low-carbon cement and concrete. Our products, which enable the production of concrete with lower CO ₂ e emissions, are expected to see higher dosage and demand. This trend is further supported by premium margins and lower interest rates for buildings with sustainable certifications.	Opp.	⊕	📍

Material impacts, risks and opportunities related to climate

Increased procurement costs due to supplier engagement & transition efforts. As suppliers engage in sustainability initiatives and transition to low-carbon practices, procurement costs could rise. These efforts are essential for aligning with sustainability standards and facilitating the shift towards less environmentally harmful operations.

I / R / O
Risk (transition)

+ / -
⊖

Value chain location
📍

Reduced energy costs through photovoltaic (PV) installation at more productions sites and implementation of energy reducing measures. The installation of PV systems at production sites and the implementation of energy-reducing technologies help Master Builders Solutions reduce and hedge energy costs. Self-generated electricity and reduced electricity demand minimise the need to purchase electricity from external sources, especially with rising energy prices due to CO₂ certificates.

Opp.

⊕

📍

Products enabling low-carbon concrete production. Our innovative products and services enable customers to significantly reduce emissions from concrete production. By lowering cement content, reducing clinker usage, and incorporating more supplementary cementitious materials, our solutions can achieve a reduction in emissions of 15-50%.¹

Impact (actual)

⊕

➔

Value chain location: ←Upstream; 📍Own operations; ➔Downstream

Read about our double materiality assessment process on [page 18](#).

¹ Compared with conventional solutions according to [Getting to net-zero, Global Cement and Concrete Association](#) and Master Builders Solutions' project outcomes.

Climate transition planning ESRS E1-1

As of 2024, we have not developed a climate transition plan. Our efforts are focused on achieving our emissions reduction targets and initiatives detailed in the later sections of this chapter. We intend to evaluate the relevance of a climate transition plan for Master Builders Solutions in 2026.

Policies and procedures ESRS E1-2

Our Environmental Protection and Energy Procedure outlines our approach to key climate and energy-related issues. It details our Environmental, Health, Safety, and Quality (EHSQ) management system, establishes guidelines for site managers and other stakeholders to develop and enhance their local EHSQ systems, and supports compliance with internal standards and external regulations. It covers environmental protection, including energy management, with the aim of promoting energy efficiency at all sites and within our operations.

The Procedure applies to all our activities globally, including those performed by joint ventures where Master Builders Solutions has operational control or where there is agreement that Construction Chemicals standards will apply. It covers our own operations and downstream activities, including R&D, manufacturing and distribution, customer use and ultimate disposal of products and waste. Our Head of Operations, Supply Chain, and EHSQ has ultimate accountability for implementing the Procedure. Employees can access it through our central, internal Group Compliance SharePoint channel, which includes the latest version of all our policies and procedures.

Actions, targets and progress ESRS E1-3, E1-4

[Actions to manage our material climate-related physical risks](#)

Our global and local Supply Chain Management (SCM) teams monitor climate-related physical risks. Ongoing, global actions include:

- **Diversification of suppliers.** By sourcing raw materials from multiple suppliers across different regions, we reduce our dependency on any single source and mitigate the impact of localised climate events.
- **Inventory management.** Maintaining higher inventory levels of critical raw materials can protect our business against supply chain disruptions caused by extreme weather events. In 2024, our global SCM team established a dashboard to improve supply chain monitoring and management. This allows local and global teams to assess and monitor risks (climate-related and any other sources), manage the inventory more efficiently, and diversify suppliers. The dashboard increases visibility and transparency of data to inform operational decisions.
- **Risk assessment and monitoring.** Regularly assessing and monitoring climate risks enables us to proactively identify potential threats and develop contingency plans.

[Ongoing actions to manage our material climate-related transition risks](#)

Our material climate-related transition risks are generally overseen by our global and local Procurement teams. Ongoing, global risk mitigation actions include:

- **Long-term contracts.** Establishing long-term contracts with suppliers can provide stability in our relationship over an extended period.

- **Cost-benefit analysis.** Conducting thorough cost-benefit analyses to evaluate the financial impact of sustainability initiatives and identify potential efficiencies.
- **Supplier collaboration.** Working closely with suppliers to understand their sustainability initiatives and transition plans which can support the co-development of solutions.

Ongoing actions to manage our material climate-related opportunities

Our Global and Local Marketing and R&D teams oversee actions to optimise climate-related opportunities. These include:

- **Market analysis and forecasting.** Conducting regular market analysis enables us to understand future demand for greenhouse gas (GHG) emissions reduction-focused products.
- **Product innovation and development.** Our R&D teams continually explore new technology and approaches to the development of low-carbon concrete to enhance our product portfolio.
- **Customer engagement and education.** We engage with customers to educate them about the benefits of low-carbon concrete.
- **Partnerships.** Through collaboration with industry peers that prioritise sustainable building practices, we can expand awareness and understanding of the benefits of low-carbon concrete.

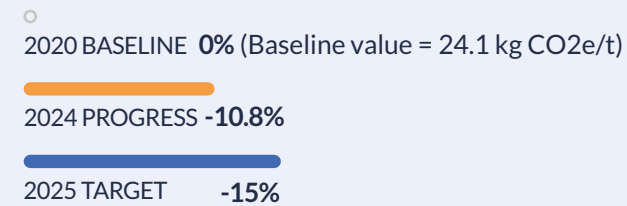
Other regional and local 2024 initiatives to manage our climate-related IROs

- **Reducing delivery emissions in Slovenia.** Our logistics team in Slovenia changed its approach to deliveries to reduce empty and partially full truck journeys, ultimately decreasing our scope 3 emissions. Engaging with customers to manage behaviour change, the team limited the number of deliveries by bundling orders. The initiative launched in Q3 2024 and led to at least a 60% reduction in the number of trips to Slovenia (from Austria and Italy).
- **Optimising bulk deliveries in France.** Our logistics team in France adapted delivery truck routes to deliver the same amount of product in fewer trips, reducing our scope 3 emissions. This meant collaborating with customers to change our delivery terms, such as introducing a minimum order quantity. We are monitoring payload per truck (i.e. how full each delivery truck is compared to its maximum capacity) and the average product quantity per order to track the effectiveness of this project. We launched the initiative in 2024 and plan to finalise implementation in 2025.
- **Expanding our tank monitoring programme.** Our tank monitoring programme reduces delivery frequency from our sites to customers, improves inventory management, and promotes bulk distribution without disrupting stock levels. This leads to more efficient deliveries, including fewer trucks, higher payload per delivery, and reduced scope 3 emissions. After several years of successful operation in Australia and New Zealand, Denmark, France, Germany, and the US, we expanded the programme to Benelux, Italy, Poland, and Spain in 2024.

- **Solar panel expansion.** In 2024, we expanded our solar panel systems in Italy, completing installation at our Treviso site and beginning at our Latina site, with the aim to complete this second installation in 2025. This will increase our renewable energy use and decrease our scope 2 emissions.
- **Production diversification in Europe.** In 2023 and 2024, we diversified our production across Europe. Five EU sites now produce a key ingredient that was previously only produced at one. This reduces delivery-linked GHG emissions alongside reducing the risk of supply chain disruption.
- **District heating in Finland.** To support scope 1 emissions reduction, our Riihimäki, Finland site permanently switched from heating with gas to district heating in 2024. 37% of energy now comes from heat pumps, 52% from natural gas sources and 11% from oil.
- **Low emissions logistics initiative in Benelux.** In Benelux, we are working with our logistics suppliers to bring lower emissions solutions to our customers. We now offer HVO100-fuelled transportation to all our Benelux customers. HVO100 is a renewable diesel made from hydrotreated vegetable oil, which produces up to 90% lower GHG emissions over its lifecycle compared to fossil diesel.
- **Reducing packaging through bulk truck deliveries.** In Poland, we introduced bulk truck delivery to our customers to reduce small orders, which would otherwise be delivered in intermediate bulk container (IBC) packaging and require more frequent trips. This reduces scope 3 emissions (from packaging and transport),

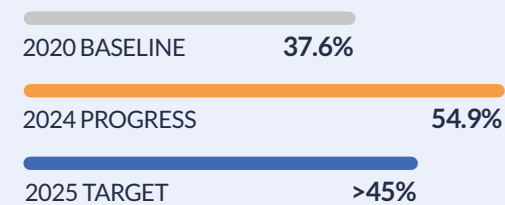
wash water needed for cleaning IBCs, and packaging waste. By the end of 2024, more than 15% of product deliveries in Poland were by bulk. This is projected to reach 30% by the end of 2025.

Reduction in CO₂e emissions from production per tonne (scope 1 and 2)



Read more about our emissions reductions on [page 27](#).

Net sales from products that enable sustainable construction¹



¹ Products that enable sustainable construction are those that can be used potentially to reduce embodied carbon of (reinforced) concrete, preserve water resources, improve early strength, replace / reduce thermal curing, improve durability and longevity of concrete structures, allow self-healing of concrete, enhance cement strength, increase the dosage of (recycled) difficult aggregates in concrete recipes, and recycle returned concrete. Other products include admixtures for geopolymers, repair mortars, and wind turbine grouts.

Energy consumption metrics ESRS E1-5

	Unit	2023	2024	Δ from 2023
Energy from non-renewable sources (fossil fuel)				
[1] Fuel consumption from coal and coal products	MWh	0	0	0%
[2] Fuel consumption from crude oil and petroleum products	MWh	32,799	27,888	-15.0%
[3] Fuel consumption from natural gas	MWh	14,362	14,381	+0.1%
[4] Fuel consumption from other fossil sources	MWh	0	0	0%
[5] Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources ¹	MWh	23,153	25,744	+11.2%
[6] Total fossil energy consumption (calculated as the sum of lines 1 to 5)	MWh	70,314	68,013	-3.3%
Share of fossil sources in total energy consumption	%	89.4%	88.9%	-
Energy from nuclear sources				
[7] Consumption from nuclear sources ²	MWh	5,850	5,750	-1.7%
Share of consumption from nuclear sources in total energy consumption	%	7.4%	7.5%	-

¹ Based on AR 32. (j) of ESRS E1, the source of electricity, steam, heat or cooling is considered as non-renewable (conservative approach).

² This is approximated from the purchased electricity and country-specific statistics on nuclear share in production of grid electricity.

	Unit	2023	2024	Δ from 2023
Energy from renewable sources (green electricity, solar, etc.)				
[8] Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.)	MWh	0	0	0%
[9] Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable energy sources	MWh	2,241	2,385	+6.4%
[10] The consumption of self-generated non-fuel renewable energy	MWh	285	381	+33.7%
[11] Total renewable energy consumption (calculated as the sum of lines 8 to 10)	MWh	2,526	2,766	+9.5%
Share of renewable sources in total energy consumption	%	3.2%	3.6%	-
Total energy consumption (calculated as the sum of lines 6, 7 and 11)	MWh	78,690	76,529	-2.7%

Greenhouse gas (GHG) metrics ESRS E1-6

	2023 (tCO ₂ e)	2024 (tCO ₂ e)	Δ from 2023
Scope 1			
Scope 1 GHG emissions	11,670	10,131	-13.2%
Percentage of scope 1 GHG emissions from regulated emission trading schemes	0%	0%	-
Scope 2			
Location-based scope 2 GHG emissions	9,727	10,203	4.9%
Market-based scope 2 GHG emissions	14,214	14,646	3.0%
Scope 3			
Total scope 3 GHG emissions	840,622	829,910	-1.3%
Category 1: Purchased goods and services	678,901	664,521	-2.1%
Category 2: Capital goods	2,280	2,031	-10.9%
Category 3: Fuel and energy-related activities	4,939	4,705	-4.7%
Category 4: Upstream transportation and distribution	114,634	120,227	4.9%
Category 5: Waste generated in operations	10,983	8,623	-21.5%

	2023 (tCO ₂ e)	2024 (tCO ₂ e)	Δ from 2023
Category 6: Business travel	3,113	2,847	-8.6%
Category 7: Employee commuting	14,093	14,853	5.4%
Category 8: Upstream leased assets	352	189	-46.3%
Category 9: Downstream transportation	47	45	-2.9%
Category 10: Processing of sold products	626	615	-1.9%
Category 11: Use of sold products	N/A	N/A	N/A
Category 12: End-of-life treatment of sold products	10,649	10,250	-3.7%
Category 13: Downstream leased assets	5	5	0.0%
Category 14: Franchises	N/A	N/A	N/A
Category 15: Investments	N/A	N/A	N/A
Total			
Total GHG emissions (location-based)	862,019	849,244	-1.5%
Total GHG emissions (market-based)	866,506	853,688	-1.5%

Read about our GHG emissions reporting methodology on [page 61](#).

	Unit	2020	2024	Δ from 2020
Scope 1 (production only)	(tCO ₂ e)	5,010	4,659	-7.0%
Scope 2 (production only, location-based)	(tCO ₂ e)	11,240	9,218	-18.0%
Scope 1 and 2 intensity per ton of product	(kgCO ₂ e/ton)	24.1	21.5	-10.8%

Carbon credits ESRS E1-7

We focus our decarbonisation efforts on reducing GHG emissions in our own operations and across our value chain. We have not purchased carbon credits or invested in carbon storage or removal projects.

Internal carbon pricing ESRS E1-8

Master Builders Solutions does not apply internal carbon pricing schemes.

Climate-related financial effects ESRS E1-9

We monitor and value ESG-related risks, including climate-related risks, as part of our general enterprise risk management process. We have not specifically valued the climate-related risks identified through our double materiality assessment.

Developing products and services that support our customers to reduce their climate impacts presents our most important climate-related financial opportunity. By working together with our customers and project owners, and understanding the specific performance requirements, we can use our latest technologies to minimise the environmental impact of the concrete in the projects.

Water

Water is fundamental to the manufacturing of our products, used as a coolant, solvent and cleaning product. The impacts, risks and opportunities identified through our double materiality assessment and outlined in the table below reflect the importance of good water stewardship for our business.

Material impacts, risks and opportunities related to water	I / R / O	+ / -	Value chain location
Consumption of significant amounts of water for different purposes. We consume substantial amounts of water for various purposes, including as a product ingredient, coolant in manufacturing processes, solvent in chemical reactions, and for cleaning operations to maintain equipment and facilities.	Impact (actual)	⊖	📍
Risk of water supply disruption at production facilities. Certain Master Builders Solutions production facilities are located in areas of high water stress, posing a risk of water supply disruptions.	Risk	⊖	📍
Increasing demand for our innovative admixtures with water-reducing capabilities. Climate change-induced water stress is driving demand for our innovative water-reducing admixtures. These products enable the production of concrete with lower water content, addressing the urgent need for sustainable solutions in response to global water scarcity.	Opp.	⊕	➔

Value chain location: ← Upstream; 📍 Own operations; ➔ Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS E3-1

Our Environmental Protection and Energy Procedure (detailed on [page 23](#)), includes our Environmental Protection commitment related to air, water, waste, and noise, with an overarching objective of minimising the negative impacts of our operations on the environment. The Procedure details our approach to water management at our sites, focusing on reducing and reusing water where possible. It also addresses the treatment and handling of wastewater. It confirms the site managers' responsibility for the management of environmental protection – including water – at sites, with support from the EHSQ function.

Actions, targets and progress ESRS E3-2, E3-3

Master Builders Solutions is committed to reducing water consumption at all our manufacturing sites. Our Global Operations and EHSQ department has established ongoing activities to mitigate negative impacts on water, considering local boundary conditions and metrics, and possible mitigation measures. Examples include:

- **Regular monitoring and data collection.** We monitor water consumption to identify outliers and hotspots, implement best-practice mitigation measures, and improve water efficiency.
- **Water recycling and reuse.** We implement water recycling and reuse systems within the production processes to reduce our overall water consumption.
- **Employee training.** All employees are trained on water conservation practices and the importance of efficient water use as part of our wider efforts to foster a sustainability-focused culture.

Our local operations teams are responsible for mitigating water supply disruption risks at the site level. This includes:

- **Water risk assessments.** Conducting regular assessments to identify facilities at high risk of water stress and developing tailored mitigation plans for each location.
- **Contingency planning.** Establishing contingency plans, including alternative water sources and emergency response protocols, to ensure continuous production during water supply disruptions.

Other regional 2024 initiatives to manage our water-related IROs

- **Wash water reuse.** At our Lancaster, US site, we installed a washing terminal to clean the trailers that transport our admixtures in bulk, which are operated by third parties. This means washing the trailers on-site instead of sending them to external terminals, avoiding 2-3 hours of transit time for each wash. This also enables us to capture and reuse the wash water generated.
- **Reducing wastewater in Benelux.** In December 2024, we installed a vacuum evaporator at our Oosterhout site in the Netherlands. The evaporator is used to recover water used in production, reducing the site's overall water consumption.
- **Reducing cooling water consumption.** In 2024, our team in Switzerland reduced water consumption and discharge by adjusting water flow during the production cooling process. By slowing the flow of cooling water to enable optimal heat exchange between hot pipes and the water, we reduced cooling water from an average of 30% of total product weight down to 12.5%.

Reduction in wastewater per tonne

○
2022 BASELINE **0%** (Baseline value = 349.8 kg/t)

2024 PROGRESS **-15.9%**

2025 TARGET **-15%**

Read more about our wastewater reductions on [page 64](#).

Net sales from products that enable sustainable construction¹

2020 BASELINE **37.6%**

2024 PROGRESS **54.9%**

2025 TARGET **>45%**

¹ Products that enable sustainable construction are those that can be used potentially to reduce embodied carbon of (reinforced) concrete, preserve water resources, improve early strength, replace / reduce thermal curing, improve durability and longevity of concrete structures, allow self-healing of concrete, enhance cement strength, increase the dosage of (recycled) difficult aggregates in concrete recipes, and recycle returned concrete. Other products include admixtures for geopolymers, repair mortars, and wind turbine grouts.

Water consumption ESRS E3-4

Total water consumption within our own operations ²	291,850 m ³
Total water consumption m ³ in areas at water risk, including areas of high-water stress ³	51,023 m ³
Total water withdrawal	485,567 m ³
Total water discharge	193,717 m ³
Water intensity (total water consumption in our own operations (m ³) per million € net revenue)	331.3

Water-related financial effects ESRS E3-5

Based on the results of our double materiality assessment, we do not currently anticipate material financial risks for Master Builders Solutions related to water.

We have an opportunity to strengthen our water tracking and data to enable us to anticipate and manage any future water-related financial risks and opportunities. For example, by tracking Master Builders Solutions' water recycling and reuse globally we can identify our biggest opportunities to save both water and costs.

² We calculate water consumption indirectly, as the difference between water withdrawn and water discharged. We recycle and reuse water where possible, however we do not currently collect precise, consistent data for this across our sites.

³ Our production sites in high-water stress areas include: Mejordada (Spain), Denver (US), Phoenix (US), Rancho Cucamonga (US), and Pooraka (Australia).

Biodiversity

Parts of the construction industry use natural resources and change how land is used – for example, for housing or infrastructure development – impacting ecosystems and biodiversity. Although our double materiality assessment did not reveal any material IROs related to our own operations on this topic, it did confirm one material value chain IRO, outlined below. Based on these results, we believe developing a biodiversity transition plan is not relevant to Master Builders Solutions at this time.

Material impacts, risks and opportunities related to biodiversity	I / R / O	+ / -	Value chain location	
Impacts on biodiversity throughout the entire value chain. Construction activities, from raw material extraction to building construction, impact ecosystems and biodiversity contributing to climate change, pollution, and resource consumption.	Impact (actual)	⊖	←	→

Value chain location: ← Upstream; ∅ Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Our approach

We recognise the potential negative impacts on biodiversity throughout our value chain. However, we currently lack detailed information to identify specific companies in our value chain that are contributing significantly to these impacts. While this limits our ability to implement targeted management strategies, we have policies and actions in place to align our stakeholders with our environmental expectations.

Our Environmental Protection and Energy Procedure (detailed on [page 23](#)) covers our own operations. It includes steps to conduct biodiversity risk assessments at chemical plants, and examples of negative biodiversity impacts and mitigation measures.

Our [Supplier Code of Conduct](#) commits Master Builders Solutions’ suppliers to use environmental resources efficiently, reduce waste, and minimise negative impacts on biodiversity. We began conducting environmental risk assessments with our high-impact, direct suppliers in 2024. This will support us in identifying potential areas of concern and prioritising actions to mitigate negative impacts.

As more companies within our value chain release Corporate Sustainability Reporting Directive-aligned reports, we anticipate that we will gain valuable insights into their biodiversity impacts and management practices, enabling us to explore more targeted biodiversity-related actions to reduce negative impacts in our value chain.

Circularity

Master Builders Solutions’ products support concrete producers to use more recycled materials and fewer virgin materials. Our biggest impact on the circular economy is therefore through our value chain, as confirmed by our double materiality assessment and outlined below.

Material impacts, risks and opportunities related to the circular economy and resource use	I / R / O	+ / -	Value chain location
Use of higher content of recycled aggregate in concrete production. Our products enable concrete producers to incorporate higher dosages of recycled aggregate in their concrete mixtures, reducing reliance on virgin aggregates and promoting circular economy principles.	Impact (actual)	⊕	→
Transforming returned concrete waste into reusable materials in other applications. Our products allow concrete producers to transform fresh returned concrete waste into reusable materials for construction backfill, road base, and other applications. This reduces landfill waste and supports sustainable construction practices.	Impact (actual)	⊕	→
Waste reduction measures at direct customers (concrete producers). Our products contribute to minimising concrete waste by transforming returned concrete into reusable material and incorporating higher recycled material content in concrete mixtures. These measures promote sustainable practices in the concrete industry.	Impact (actual)	⊕	→

Value chain location: ← Upstream; ○ Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Our approach

To maximise the positive impacts associated with our product portfolio, our customers and industry need to be aware of them. Our Corporate Communications, Marketing and Sales teams are well placed to drive awareness, as they engage directly with these stakeholders on the topic of sustainability. Throughout 2024, ongoing initiatives to demonstrate the circularity-related benefits of our products and support a more circular construction industry include:

- **Communications.** Through various channels, we highlight the environmental benefits of our products and encourage the adoption of low-carbon concrete solutions, water-reducing admixtures, and circular economy practices.
- **Customer education and support.** We offer our customers education and support on the benefits and use of our products, including training, workshops, and detailed product information to help customers adopt more sustainable practices regarding climate change mitigation, water reduction, and circularity.
- **Collaboration and partnerships.** We partner with companies and environmental organisations to encourage more sustainable construction practices. This includes participation in joint initiatives and projects that support climate change mitigation, water conservation, and circularity.
- **Monitoring and reporting.** We monitor the impact of our products on GHG emissions, water use, and waste reduction through established systems. We also regularly report on the progress and effectiveness of our sustainability initiatives to our stakeholders.

- **Investing in R&D.** By creating innovative products, we enable low-carbon concrete production, reduce water use, and contribute to the circular economy. We are focused on reducing cement content and clinker usage, and incorporating more supplementary cementitious materials and recycled aggregates.

2024 regional initiatives to manage our value chain waste-related IROs

- **Decreasing packaging waste.** Our teams in Croatia and Slovenia engaged customers to return intermediate bulk containers (IBCs) – the containers used to deliver our products and raw materials – as this was not the case historically. We adjusted the terms and conditions of customer agreements and other customer communications to encourage IBC returns. This led to 60-65% of IBCs being returned in 2024, compared to less than 10% in 2023. This permanent change supports a reduction in packaging materials and scope 3 emissions, higher reuse of existing packaging, and less waste in our downstream value chain.
- **Expanding use of biodegradable bags.** In Australia, we are continuing to replace composite cement bags with fully biodegradable bags to reduce downstream waste. The bags, under optimal composting conditions, break down completely within four weeks. By the end of 2024, 20% of our powder products in Australia were packed in these biodegradable bags. This is projected to grow to more than 60% by the end of 2025.



Social disclosures

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Here we detail our approach to creating and managing a safe working environment and a healthy workplace culture for the ~1,800 Master Builders Solutions employees worldwide. Good working conditions and equal treatment and opportunity are central topics, as these are critical to attracting and retaining the skilled people we rely on to innovate and produce our products and services. We also outline our approach to human rights and employee privacy, for which we have processes and expectations aligned with internationally recognised guidelines.



Our workforce

Our employees are the core of our business — they develop and deliver innovative products and services, engage with customers and industry to understand the solutions our industry needs, and run our day-to-day operations. Offering our people a safe, fair and prosperous work environment is therefore central to our business success. Our material impacts, risks and opportunities related to our own workforce are detailed in the relevant subsections on [pages 38-47](#).

Listening to our employees ESRS S1-2, S1-3, S1-4

We use a range of tools and communication channels to engage employees and understand how to continually improve their working environment. For example:

- **Townhalls.** Employees can stay up to date with the business, participate, and ask questions through management meetings and global and local townhall sessions. We held three global townhalls in 2024. Regional teams host additional townhalls focusing on local projects, activities and key metrics.
- **Confidential channels to raise concerns.** We encourage employees to raise any confidential concerns directly to their managers or senior leaders, or through our third-party SpeakUp platform (read more on [page 51](#)).
- **Culture workshops.** In 2024, we ran a series of culture workshops to engage employees in redefining our corporate values, listen to their ideas and concerns, and ultimately strengthen our company culture. We held one culture workshop in most countries in which we operate, tailored based on the country context, with the results communicated to employees of each country.
- **Global Management Survey.** In 2024, we completed the second of our two-part management survey series, with 210 managers responding (92% response rate). The first survey, conducted in 2023, established our baseline eNPS across eight categories — covering satisfaction, motivation, trust and performance. The 2024 survey included the same questions to assess the impact of employee engagement and culture initiatives implemented during the year. Our results showed positive progress across all categories, indicating that our continued efforts to improve as an employer have been effective. Master Builders Solutions also scored higher than the European company employee average in seven of the eight covered areas. With a firm baseline now set, we will repeat the survey every two years.

Employees metrics¹ ESRS S1-6, S1-7

	Europe	North America	Australia & New Zealand	Asia, Middle East, Turkey (AMET)	Latin America	Total
# employees (headcount)	969	565	172	67	19	1,792
Workforce by contract type						
# of permanent employees	916	512	157	67	19	1,671
# of temporary employees	38	2	3	0	0	43
# of non-guaranteed hours employees	15	51	12	0	0	78
Workforce by employment type						
# of full-time employees	912	565	170	67	19	1,733
# of part-time employees	57	0	2	0	0	59
Workforce by gender						
# of female employees	305	96	41	12	5	459
# of male employees	665	468	131	55	14	1,333

Countries with more than 50 employees

	Australia	France	Germany	Italy	Spain	United States
# employees (headcount)	161	88	258	164	133	516
Workforce by contract type						
# of permanent employees	147	81	248	153	132	465
# of temporary employees	2	7	8	0	1	0
# of non-guaranteed hours employees	12	0	2	11	0	51
Workforce by employment type						
# of full-time employees	159	87	222	162	128	516
# of part-time employees	2	1	36	2	5	0
Workforce by gender						
# of female employees	40	29	104	42	39	94
# of male employees	121	59	154	122	94	422

¹ Employees metrics are reported in headcount, at the end of the reporting period.

Turnover data

# employees who left the organisation (headcount)	310
Turnover rate (%)	17.3%
Turnover by region	
Europe	111
North America	156
Australia & New Zealand	43
Other regions	0
Turnover by age group	
Under 29 years old	67
30 – 49 years old	131
Over 50 years old	46
Missing age information	5
Turnover by gender	
# of female employees	61
# of male employees	249

New hire data

# employees who left the organisation (headcount)	321
Turnover rate (%)	17.9%
Turnover by region	
Europe	133
North America	122
Australia & New Zealand	46
Other regions	20
Turnover by age group	
Under 29 years old	107
30 – 49 years old	159
Over 50 years old	51
Missing age information	4
Turnover by gender	
# of female employees	77
# of male employees	244

Health and safety

Material impacts, risks and opportunities related to health and safety	I / R / O	+ / -	Value chain location
Different measures in place to support employees' health and safety. We are committed to ensuring the health, safety, and wellbeing of our employees through robust systems and processes. These include accident incident management, cross-site audits, regional training platforms, incident reports, and monthly meetings to share best practices. High safety requirements and periodic audits in R&D laboratories further support a safe working environment.	Impact (actual)	⊕	📍
Potential workforce injuries or fatal accidents. Given the sector we operate in, there is always a risk of high-consequence injuries or fatalities if guidelines and instructions are not properly followed.	Impact (potential)	⊖	📍
Associated risks of a high-consequence injury or fatality. A serious workplace injury or fatality can damage a company's reputation, lead to legal costs, and make it harder to attract and retain employees.	Risk	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

Our Environmental Health, Safety, and Quality (EHSQ) Policy outlines how we manage EHSQ-related issues. The Occupational Health and Safety Procedure within our Policy details our EHSQ management system, establishes a guideline for site managers and other stakeholders to develop and enhance their local EHSQ systems, and supports compliance with internal standards and external regulations. The Procedure includes sections on occupational safety, health management, hazard identification and risk assessment, hazardous energy control, and our work permit system — all of which support us in managing health and safety-related impacts, risks and opportunities (IROs).

The Procedure applies to all Master Builders Solutions' activities globally, including those performed by joint ventures where Master Builders Solutions has operational control or where there is agreement that Construction Chemicals standards will apply. It covers our own operations and downstream activities, including R&D, manufacturing and distribution, customer use and ultimate disposal of products and waste. Our Head of Operations, Supply Chain, and EHSQ has ultimate accountability for implementing the Procedure.

Employees can access the Procedure through our central Group Compliance SharePoint channel, which includes the latest version of all our policies and procedures.

Actions, targets and progress ESRS S1-4, S1-5

Our global Operations and EHSQ departments oversee our occupational health and safety management system, and local Operations and EHSQ teams are responsible for following standard operating procedures established at the Group level. Examples of ongoing activities to promote workplace health and safety, effective in 2024, include:

- **Regular environment, health and safety (EHS) training.** We hold regular training sessions to educate all employees on safety protocols and emergency procedures.
- **Accident and Incident Management System (AIMS).** We collect and analyse incident reports to identify patterns and implement preventive measures.
- **Emergency response training.** We provide emergency response training to prepare employees for potential incidents and enable quick, effective action.
- **Cross-site audits.** We perform regular cross-site audits to support consistent safety practices across all locations and to share best practices. In 2024, we conducted 12 EHS audits, which resulted in an average audit score of 2.07 on a five-point scale (1= excellent; 5 = critical).¹
- **Employee engagement.** Actively involving employees in safety initiatives and decision-making processes helps to foster a sense of ownership and responsibility to maintain a safe working environment.
- **Safety culture and Global Safety Day.** Every year, we host a Global Safety Day at all our sites and locations to engage our colleagues in promoting a strong safety

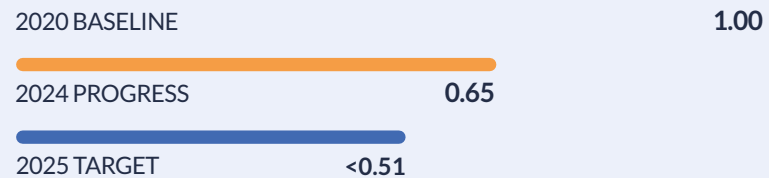
culture. The day focuses on awareness training, and is adapted to the local needs of every manufacturing site. In 2024, the awareness training centred on slips, trips and falls. Our efforts to promote a safety culture are tracked indirectly through our Lost Time Injury (LTI) target and near-miss reporting.

2024 regional initiatives to manage our health and safety-related IROs

- **Health Campaign in Italy.** Our ongoing Health Campaign in Italy continued in its third year in 2024, where we invited an external medical clinic to our sites to offer employees a voluntary health check-up. The aim is to support the long-term health of our employees. Currently, the effectiveness of the campaign is not formally tracked.
- **Reducing opportunity for accidents in Spain.** In 2024, at our site in Mejordada, Spain, we installed a mass loading bay to weigh and load trucks in one place. Previously, the loading bay and truck scale were at two different points at the site, meaning one to four circles between the two points per truck per day. Eliminating this back and forth increases safety on site by lowering the opportunity for accidents. It also means a more efficient process, saving time and reducing fuel consumption on site.

¹ The average audit score does not include the four audits from North America, as these audits followed the prev. rating methodology (out of 100%).

Lost Time Injury rate (own workforce)



Supporting policy: EHSQ Policy (see [page 38](#))

Health and safety metrics (own workforce) ESRS S1-14, entity-specific

% of employees covered by a health and safety management system ¹	1,739 / 97%
# and % of employees covered by a formal joint management and workers Health and Safety Committee ²	986 / 55%
# of fatalities resulting from work-related injuries and work-related ill health	0
# of cases of recordable work-related ill health ³	0
# of reported process safety incidents (PSI)	2

1 Employees of Turkey joined the Group in December 2024, and consequently were not covered by our health and management system within 2024.
 2 We have a formal, joint Health and Safety Committee with management and workers in Austria, Denmark, France, Germany, Italy, the Netherlands, Poland, Spain (Mejorada site), Sweden, the UK, and the US (Kingman site).
 3 Subject to legal restrictions on the collection of data.

# of hours worked (million hours) ⁴	3.1
Employees	
# of recordable work-related accidents (LTI) ⁵	2
Rate ⁶ of recordable work-related accidents (LTI)	0.65
# of days lost to work-related accidents (LTI)	27
Lost time injury severity rate ⁷	8.70
Non-employees⁸	
# of recordable work-related accidents (LTI) ⁶	3
Rate ⁵ of recordable work-related accidents (LTI)	0.97
# of days lost to work-related accidents (LTI)	12
Lost time injury severity rate ⁷	3.87

4 The total working hours is estimated on the basis of standard hours of work, taking into account entitlements to periods of paid leave of absence from work (for example, paid vacations, paid sick leave, public holidays).
 5 We consider Lost Time Injuries (LTI) as recordable work-related accidents.
 6 Rate is calculated based on 1,000,000 hours worked, indicating the number of accidents / injuries per 500 full time people in the workforce over a 1-year timeframe.
 7 Lost time injury severity rate is calculated based on 1,000,000 hours worked: number of days lost / million hours worked.
 8 Non-employees are people employed by a third party engaged in "employment activities" (NACE Code N78).

Secure employment and living wage

Material impacts, risks and opportunities related to secure employment and living wage	I / R / O	+ / -	Value chain location
Secure employment with wages exceeding living wage thresholds. Practices to support secure employment positively impact workers by reducing poverty, promoting economic security, and boosting overall productivity and stability.	Impact (potential)	⊕	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

We are committed to ensuring secure employment by adhering to national labour regulations and industry standards in every country where we operate. In twelve countries, we have established union and collective bargaining agreements, which play a vital role in promoting job security and supporting fair wage practices. While we currently do not have a formal policy or defined targets regarding the provision of a living wage, 2024 marks a key milestone as we conducted our first comprehensive analysis on this topic. This foundational step enables us to better understand wage adequacy across our operations and informs future considerations for policy development.

Actions, targets and progress ESRS S1-4, S1-5

Examples of existing activities that continued during 2024 to promote secure employment for our employees include:

- **Annual salary adjustment.** We conduct regular reviews and adjust wages based on inflation and cost of living.
- **Continuous Performance Management (CPM).** As part of our CPM programme of annual performance reviews, we seek to understand employee needs and concerns – including wages and employment conditions – and aim to address these proactively.
- **Transparent communication.** We maintain transparent communication with employees about wage policies and any changes to encourage trust and clarity.

Adequate wages metrics ESRS S1-10

% of employees paid an adequate wage in line with applicable benchmarks. ¹	99.7%
Countries where employees are paid below the applicable adequate wage benchmark	Mexico ²
# of employees in Mexico paid below minimum adequate wage	5 (26.3% of Mexico's employees)

1 We assess adequate wages by country and by comparing the minimum annual base salary for Master Builders Solutions employees with the minimum adequate wage, defined as 50% of gross average monthly wage in that country. This is aligned with the United Nations Economic Commission for Europe guidance.

2 The analysis is based only on the fixed monthly salary in Mexico and does not consider the monthly variable sales commission of the employees.

Equal treatment

Material impacts, risks and opportunities related to equal treatment and opportunity	I / R / O	+ / -	Value chain location
Implementing additional measures to improve diversity and inclusion. Implementing such measures could further improve corporate culture, strengthen employer-employee trust, and increase the company’s attractiveness. These measures include boosting the representation of women and underrepresented groups, reinforcing anti-violence and harassment policies, and fostering the inclusion of persons with disabilities.	Impact (potential)	⊕	📍
Increasing costs and risk of disruptions to operations due to skilled labour shortages. A scarcity of skilled workers is adding pressure on the sector to meet the demands of new construction growth in the context of increasing costs, the demand for reliable construction materials, and solutions supporting building efficiency.	Risk	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

We aim to offer a healthy, fair and welcoming work environment where current and potential employees from all backgrounds are motivated to do their best work. The following policies and procedures support this commitment and apply to all Master Builders Solutions employees. Our Global Human Resources function has ultimate accountability for ensuring operational alignment with our policies. Employees have access to these materials through our central Group Compliance SharePoint channel, which includes the latest version of all our policies and procedures.

- **Diversity and Inclusion (D&I) Policy.** Seeks to ensure that the business benefits of workforce diversity are realised (e.g. pooling ideas from employees with diverse skills and backgrounds to react to a fast-changing environment) and that all employees feel valued and appreciated for their uniqueness, enabling them to perform at their best.
- **Compensation Based on Position Procedure.** States that jobs of comparable value should be compensated in the same manner, irrespective of gender, ethnicity, or other attributes. It outlines Master Builders Solutions’ job grades and principles for using job grading to determine the value of a position. This Procedure is applied for all Master Builders Solutions roles globally.
- **Respect for Labour and Social Standards Policy.** Confirms our commitment to international labour and social standards – including human rights and anti-harassment. Read more on [page 46](#).

Actions, targets and progress ESRS S1-4, S1-5

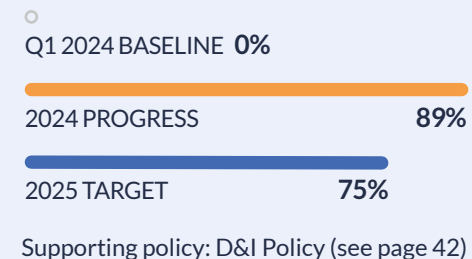
In 2024, our Global and Local Human Resources teams further developed our approach to ensuring and promoting equal opportunities for all. For example, our Danish team introduced several measures to support D&I, including an employee survey (98% participation rate) and two, half-day workshops (90% participation rate) covering regulations, legislative changes in the country, and consequences of actions.

In 2025, we will explore several potential global initiatives to expand our positive impact on people and strengthen our workforce, and ultimately our business, including:

- **D&I training.** Providing regular D&I training to educate employees on its importance and promote a respectful and inclusive workplace.
- **Anti-harassment policies.** Enforcing stricter anti-violence and harassment policies to further support a safe and respectful work environment for all employees. Our existing Labour and Social Standards Policy confirms our zero tolerance for workplace harassment. Read more on [page 46](#).

Master Builders Solutions does not track or disclose data related to the employment or hiring of people with disabilities.

Percentage of employees trained on equal treatment



Diversity metrics ESRS S1-9

	Top management ¹	All employees
# of employees	21	1,792
Workforce by age group		
Under 29 years old	0 (0%)	215 (11.2%)
30 – 49 years old	9 (42.9%)	886 (49.4%)
Over 50 years old	12 (57.1%)	687 (38.3%)
Missing age information	–	4 (0.2%)
Workforce by gender		
# of female employees	6 (28.6%)	459 (25.6%)
# of male employees	15 (71.4%)	1,333 (74.4%)

¹ Top management is defined as team leads with direct report to the Group Management Board. The diversity and age group of the Group Management Board are not included in this table.

Remuneration metrics (gender pay gap) ESRS S1-16

Job grade	Population within each job grade	Gender pay gap ¹ per job grade - annual basic salary (average)	Gender pay gap ¹ per job grade - Total target cash (average)
0	16%	30%	31%
1	6%	-30%	-33%
2	11%	-35%	-32%
3	16%	0%	2%
4	29%	13%	16%
5	14%	11%	10%
6	6%	9%	5%
7	2%	3%	-16%
Weighted gender pay gap		5.1%²	5.8%

1 Gender pay gap is calculated as $\frac{\text{average annual salary of male employees} - \text{average annual salary of female employees}}{\text{average annual salary of male employees}} \times 100$

2 The 5.1% weighted gap indicates that the male employees earn 5.1% higher annual basic salary than female employees on average, across job grades.

Incidents and complaints metrics ESRS S1-17

Total # of incidents of discrimination reported	0
Total # of incidents of harassment reported ³	1
Total # of harassment-related complaints filed through our employee SpeakUp channel	0
Total amount of fines, penalties, and compensation for damages resulting from discrimination and harassment incidents and complaints	€0
Completion rate for equal treatment training in 2024	89%

3 This reported incident of verbal harassment received through direct email was determined to be unsubstantiated after formal review by Group Compliance.

Training and development

Material impacts, risks and opportunities related to training and development	I / R / O	+ / -	Value chain location
Training of employees spanning multiple themes. We provide comprehensive training for employees on various themes, including work-based skills development, equal treatment, and workplace harassment. Mandatory compliance training promotes employees' awareness of and adherence to these standards.	Impact (actual)	⊕	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

Our Global Human Resources function oversees our standard processes to support our employees to learn, upskill and advance in their careers. At the global level, these include:

- Talent Management Procedure.** Provides a framework and process to support employee development and retention, with sections covering continuous performance management, employee reviews and development, roles and responsibilities, and succession planning for key positions. It applies to all Master Builders Solutions employees globally and is especially useful for leaders.
- Continuous Performance Management.** We conduct annual employee performance reviews in all countries and encourage mid-year reviews.

In 2024, local Human Resources functions and line managers carried out continuous performance management, covering personal development goals, accomplishments, and demonstration of corporate values.¹

Actions, targets and progress ESRS S1-4, S1-5

In 2024, our Global Human Resources and Global Compliance teams continued to develop our approach to equal treatment and opportunities for all. We also continued using our e-learning platform, Master Builders Solutions Academy, to provide mandatory compliance training for employees on topics such as anti-bribery and anti-harassment, and voluntary training on topics such as marketing, our products and services, and the wider concrete industry. Beyond these trainings, we encourage and financially support employees to pursue further education.

Training and development metrics ESRS S1-13

% of employees that participated in regular performance and career development reviews	1,706 (95.2%) ²
Average # of training hours per employee	10.8

¹ For employees in Germany, the performance review process was reviewed with the local work council before being conducted with individual employees and their line managers.

² All employees except employees of India, Mexico and Turkey participated in annual performance review.

Human rights

Material impacts, risks and opportunities related to worker rights	I / R / O	+ / -	Value chain location
Associated risks of scandals involving child or forced labour. Scandals involving child or forced labour can harm a company’s reputation, leading to legal penalties, and reducing employee attraction and retention.	Risk	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

Master Builders Solutions’ Respect for Labour and Social Standards Policy confirms our commitment to international labour and social standards – such as human rights and anti-harassment – for all our key stakeholder groups, including employees, customers, investors, and communities. It establishes key principles, confirms our position and alignment with global standards, and outlines our risk management process. The Policy applies to all our employees across all regions, and our Group Human Resources function has ultimate accountability for its implementation. Employees can access the Policy through our central Group Compliance SharePoint channel, which includes the latest version of all our policies and procedures.

We seek to align the Policy with widely recognised standards, including the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the International Labour Organization (ILO) Tripartite Declaration of Principles

concerning Multinational Enterprises and Social Policy, and the ILO Declaration on Fundamental Principles and Rights at Work. We also use the SA 8000 and SMETA (Sedex), which are social standards commonly recognised by our customers.

The Policy also confirms our stance on zero tolerance of child or forced labour, harassment, or other forms of workplace distress. It outlines minimum standards that must be respected, our management process, and examples of possible exceptions for each of these areas. While our Respect for Labour and Social Standards Policy applies specifically to our employees, our [Supplier Code of Conduct](#) extends our expectations to the suppliers we work with. This includes an expectation to support and protect internationally proclaimed human rights, and fight forced and child labour.

Actions, targets and progress ESRS S1-4, S1-5

Our Global and Local Human Resources teams manage compliance with labour and social standards, including but not limited to the avoidance of child and forced labour. Group Compliance oversees the actions taken by Global and Local Human Resources teams. Ongoing company-wide activities, effective in 2024, include:

- **Hiring policies.** We implement hiring policies to verify that all employees meet the minimum age requirements as per local and international labour laws. We review age documentation during the hiring process to prevent instances of child labour.

- **Incident reporting mechanism.** We offer confidential mechanisms for employees to report any concerns or violations related to labour practices. This enables us to review reports seriously and investigate them promptly. Read more in Corporate culture on [page 51](#).

Percentage of buyers trained on human rights due diligence



Human rights metrics ESRS S1-17

# of severe human rights incidents connected to our own workforce (including child or forced labour)	0
Total amount of fines, penalties and compensation for severe human rights incidents connected to our own workforce	N/A. No incidents.

Employee privacy

Material impacts, risks and opportunities related to employee privacy	I / R / O	+ / -	Value chain location
Presence of guidelines, policies and tools to protect employee data. Ensuring protection of employee data through guidelines, policies, and tools has a positive impact on safeguarding personal information, maintaining trust, and complying with legal requirements. This approach helps prevent data breaches, protect employees' privacy, and foster a secure work environment.	Impact (actual)	⊕	📍
Failure to implement or maintain effective safeguards of employees' personal data. Failure to consistently enforce or update IT security policies can result in data breaches.	Impact (potential)	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS S1-1

Core policies to protect data, information, and employee privacy include our:

- **Data Protection Policy.** Establishes our minimum requirements for the protection of personal data. It applies to all our employees and contractors globally, whenever they collect, process, transfer, make available, store or otherwise use personal data in connection with their work for Master Builders Solutions. The Policy includes key terms and definitions, examples of what personal data is,

and our data privacy principles and requirements. It also confirms our alignment with the EU General Data Protection Regulation (GDPR). Our Group Legal function oversees the overarching data protection strategy and has ultimate accountability for implementing the Policy.

- **IT Security User Policy.** Outlines guidelines, best practices and general principles for all users — including Master Builders Solutions’ employees and business partners with access to our assets — to promote information security. The Policy covers secure working (from company-owned sites and remotely), device security, asset and information security, secure handling of media, external communication and guest access, and recognising and reporting security events. Our Group IT function is ultimately accountable for the implementation of the Policy.

These documents are available to all Master Builders Solutions’ employees through our central Group Compliance SharePoint channel, where they have access to the latest version of every policy and procedure.

Actions, targets and progress ESRS S1-4, S1-5

Our Global IT team is responsible for data protection and IT security globally. Examples of actions currently implemented include:

- **Employee training and engagement.** We conduct regular training sessions to educate employees about data protection practices and the importance of safeguarding personal information. We also encourage them to actively participate in data protection by reporting any suspicious activities or potential security threats.

- **Advanced security tools.** We implement security tools and technologies, such as encryption, access controls, and secure data storage solutions, to protect employee data from unauthorised access.
- **Incident response plan.** We maintain and update an incident response plan to quickly and effectively address any data breaches or security incidents.

Employee privacy metrics ESRS S1, entity-specific

# of breaches of employee data	0
Completion rate for IT user security training in 2024	94%
Completion rate for data protection training in 2024	87%



Governance disclosures

Corporate culture	50
Anti-corruption and anti-bribery	53

Our longstanding commitment to good governance is supported by established policies and processes. Here we detail the key mechanisms we use to support ethical conduct across our own operations and value chain, including our Code of Conduct and Supplier Code of Conduct policies, processes to report and investigate concerns, compliance training, and our approach to detecting and preventing corruption and bribery.



Corporate culture ESRS G1-1

Our commitment to doing business responsibly is grounded in robust policies, procedures and employee training. We use these mechanisms to manage key impacts, risks and opportunities (IROs), protecting and promoting the integrity of our business. Through our double materiality assessment, we identified the following material IROs:

Material impacts, risks and opportunities related to corporate culture	I / R / O	+ / -	Value chain location
Increase in employee retention rate due to improved corporate culture. Improving corporate culture can increase employee retention rates, reducing recruitment and training costs. A more engaged workforce boosts productivity and overall company performance, contributing to long-term stability and growth.	Opp.	⊕	📍
High turnover rates, reduced employee morale, and difficulty in attracting top talent. Potential toxic or unethical corporate culture could result in high turnover, low morale, and challenges in recruiting top talent. We are focused on fostering a positive corporate culture to enhance productivity and business performance.	Risk	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures

The Master Builders Solutions’ Code of Conduct, revised in 2023, is our central policy that outlines our rules for responsible business. It provides guidance on making ethical choices and is binding for all employees of Master Builders Solutions worldwide. Group Compliance is responsible for developing and updating the Policy, our Group Management Board has oversight and approval, and our CEO has ultimate responsibility for its implementation. It is available publicly on our website.

The Code includes dedicated sections covering 12 key topics, such as corruption, data protection, and human rights, and considers all our key stakeholder groups, including employees, customers, suppliers, shareholders, and local communities. It is aligned with internationally recognised commitments, including the UN Global Compact, the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy.

We extend the guidelines and expectations outlined in our Code of Conduct to our supply chain through our Supplier Code of Conduct. It specifies our approach to safety, human rights risks, and the environment. We require all suppliers to commit to our Supplier Code of Conduct as part of our general purchasing terms and conditions.

All Master Builders Solutions’ policies and procedures – including those listed above – are available to all our employees globally on our central, internal Group Compliance SharePoint channel.

Actions, targets and progress

Fostering strong company culture

In 2024, we ran a series of culture workshops to engage employees in confirming our corporate values, listen to their ideas and concerns, and ultimately strengthen our company culture. We track company culture via our two-part Global Management Survey series. The first survey, conducted in 2023, established our baseline across eight categories, covering satisfaction, motivation, trust and performance. The second survey in 2024 saw positive progress against all eight categories. Read more on [page 35](#).

Raising and investigating concerns

In order to raise concerns, our employees must be aware of what constitutes misconduct. We use leaflets, posters, and various electronic communications, as well as our Code of Conduct and compliance training programme, to support employees to identify such incidents.

We enable our employees and business partners to raise concerns related to a breach of the Code of Conduct, company policies, or suspected or actual misconduct through accessible and confidential reporting channels. These include:

- **Speaking directly with senior leaders.** We encourage all employees to raise concerns directly to a senior manager in confidence, ensuring no disadvantage to anyone raising an issue. Employees can contact their manager, their head of department, the Chief Compliance Officer (CCO), Group Head of Audit, Group

Head of HR, or the CEO. External parties, such as contractors, suppliers, members of local communities, shareholders, and other stakeholders, can report any suspected compliance breaches to the CCO through a letter.

- **Third-party SpeakUp channel.** Our SpeakUp channel is anonymous, available 24/7 in 44 languages, and operated by an external service provider, enabling employees to report concerns confidentially. We also encourage our external stakeholders to use our dedicated SpeakUp channel for business partners. We provide access through our website and inform partners about the channel during onboarding (where relevant) and in our Supplier Code of Conduct.

Our Internal Investigations Procedure ensures we investigate every reported concern and implement appropriate corrective measures in all instances. Upon receiving an allegation, Group Legal & Compliance informs our Investigation Committee, which is responsible for following up concerns. The Committee includes the CCO, the Head of HR, the Head of Internal Audit, and a designated Lead of the Investigation – chosen based on the relevance of their function, the subject of the allegation, and the identity of the accused person.

The Lead of the Investigation is responsible for conducting and finalising the investigation within three months. If an allegation involves a Group Management Board Member, a local Managing Director, or a member of the Investigation Committee, that person is not involved or informed about the allegation or investigation, and the investigation is handled externally.

In 2024, eight concerns were reported and investigated. Five were confirmed as incidents – all related to human resources, including health and safety. For all five incidents, corrective measures were implemented to avoid the occurrence of similar incidents in the future. Disciplinary measures were only required for one incident.

Training

To support adherence to our high ethics and compliance standards, we provide online training for all employees through our e-learning platform, Master Builders Solutions Academy.

Our compliance training programme runs on a two-year cycle. In January 2024, we launched a new training cycle, available in all relevant local languages and covering all our major compliance risks. Modules covering the basics of compliance, equal treatment and non-discrimination, our Code of Conduct, anti-trust, anti-corruption, handling conflicts of interest, whistleblowing protection, and data protection are mandatory for all employees and accessible globally through the Academy platform. Additional training is assigned based on role.

Group Compliance is responsible for selecting and reviewing the compliance content from our external training provider.

Training targets	Audience	Frequency	Target completion rate (2025) ¹	Actual completion rate (2024)
Basics of compliance. What compliance means and why is it important; how to behave compliantly; and responding to compliance violations.	All employees	Annual	75%	90%
Code of Conduct. How to treat colleagues, partners, and customers fairly; ensuring data protection in daily work; preventing corruption in the company; communicating effectively internally and externally; and responding to compliance violations.	All employees	Annual	75%	88%
Whistleblowing protection. What whistleblowing is; why it is important; why report misconduct; when to act; and what and how to report.	All employees	Annual	80%	84%

¹ For targeted employees.

Anti-corruption and anti-bribery ESRS G1-3, G1-4

Material impacts, risks and opportunities related to anti-corruption and anti-bribery	I / R / O	+ / -	Value chain location
Reputational damage and fines stemming from corruption and bribery incidents. Potential practices of corruption and bribery pose risks to a company, including legal penalties, reputational harm, and financial loss. Such unethical actions could damage relationships with stakeholders, erode trust, and lead to long-term consequences if not properly addressed and prevented through strong compliance programmes and oversight.	Risk	⊖	📍

Value chain location: ← Upstream; 📍 Own operations; → Downstream

Read about our double materiality assessment process on [page 18](#).

Policies and procedures ESRS G1-3

The Master Builders Solutions’ Anti-Corruption Policy supplements our Code of Conduct and Supplier Code of Conduct. It includes our anti-corruption principles, tools to identify incidents of corruption, example scenarios, and responses to common questions – supporting us to detect, prevent and address corruption.

The Policy applies to all Master Builders Solutions employees. Our Compliance team maintains a central repository of all our policies, accessible to all our employees at any time and from anywhere in the world. The respective departments are responsible for specific communication and training on policies within their departments.

Employees are encouraged to identify and report any concerns regarding corruption directly to a manager, the Compliance team, or through our confidential SpeakUp

reporting channel. Read more about SpeakUp and how users are made aware of the channel on [page 51](#).

We take the same approach to investigating corruption-related concerns as we do all compliance-related concerns. Read more on [page 51](#).

Actions, targets and progress ESRS G1-3

Our Board of Management, local Managing Directors, and Group Compliance are responsible for managing and preventing risks related to corruption and bribery. Company-wide activities include:

- **Internal controls.** We use internal controls and oversight mechanisms to monitor transactions and business practices. This includes segregation of duties, regular audits, and continuous monitoring to detect and prevent corruption.
- **Promoting transparency.** We maintain open and transparent communication channels regarding business practices and decisions so that transactions and interactions are documented and accessible for internal review.
- **Encouraging whistleblowing.** We work to create a safe and confidential environment for employees to report any concerns or violations related to corruption and bribery, for example through our SpeakUp line (read more on [page 51](#)). Our Whistleblowing Policy protects employees from retaliation.
- **Regular audits.** We perform regular audits to support compliance with anti-corruption policies and identify any potential vulnerabilities. Audit findings are used to improve policies and practices.

- **Training.** We provide regular training sessions for employees on our anti-corruption and bribery policies to educate them on how to identify, prevent, and report unethical practices. All Master Builders Solutions employees, except manufacturing staff, must complete specific training on anti-corruption and handling conflicts of interest. This includes all members of our management.

Training targets	Audience	Frequency	Target completion rate (2025) ¹	2024 completion rate
Anti-Corruption and Anti-Bribery. What corruption is; how to handle benefits and gifts and avoid undue influence; determining if benefits are proportionate; and the consequences of corruption allegations.	All employees except production workers.	Annual	80%	83%
Handling conflicts of interest. What a conflict of interest is; the consequences of conflicts of interest; and preventing conflicts of interest; and recognising early warning signs.	All employees except production workers.	Annual	80%	93%
Anti-Money Laundering. What money laundering is; how to detect it early; assessing and responding to risks; and the consequences of money laundering.	Sales, Marketing, Procurement, Finance and Controlling, and Heads of Business Functions.	Annual	80%	33%

¹ For targeted employees.

In general, the employees at highest risk of corruption and bribery are those in customer- and supplier-facing roles, such as sales, marketing, and procurement. We address this risk through additional training and internal controls. For example, we require more extensive anti-money laundering training for functions with greater potential exposure to this issue. This training was launched in December 2024, with a completion rate of 33% by the end of 2024.

Anti-corruption and anti-bribery metrics ESRS G1-4

% of functions-at-risk covered by anti-corruption training programmes	100%
# of confirmed incidents of corruption or bribery	0
Nature of confirmed incidents of corruption or bribery	N/A. No incidents.
# of convictions for violation of anti-corruption and anti-bribery laws	0
Amount of fines for violation of anti-corruption and anti-bribery laws	€0
Actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery	N/A. No breaches.
# of confirmed incidents in which employees were dismissed or disciplined for corruption or bribery-related incidents	0
# of confirmed incidents relating to contracts with business partners that were terminated or not renewed due to violations related to corruption or bribery	0



Additional disclosures

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In this chapter, we share additional information beyond what is suggested under the current European Sustainability Reporting Standards framework. While the topics covered in this chapter fall below our materiality threshold, we have included this information for context – to support further understanding of the sustainability impacts, risks and opportunities related to our business and how we manage them.



Additional general disclosures

Report scope: entities included

Bluey Technologies Pty. Ltd. Australia	Australia	Construction Research & Technology GmbH	Germany	Master Builders Solutions España S.L. Sucursal EM Portugal	Portugal
MB Solutions Australia Pty. Ltd.	Australia	Master Builders Solutions Deutschland GmbH	Germany	Master Builders Solutions Romania SRL	Romania
Master Builders Solutions GmbH	Austria	Master Builders Solutions Holdings GmbH	Germany	MBS CZ-SK s.r.o., organizačná zložka Slovensko	Slovak Republic
Master Builders Solutions Admixtures Systems Belgium B.V.	Belgium	MB Trading GmbH	Germany	Master Builders Solutions GmbH Podružnica Ljubljana	Slovenia
Master Builders Solutions Romania SRL – Bulgaria Branch	Bulgaria	Master Builders Solutions UK Ltd. Ireland Branch	Ireland	Master Builders Solutions España S.L.	Spain
Master Builders Solutions Canada Inc.	Canada	Master Builders Solutions Italia S.p.A.	Italy	Master Builders Solutions Sverige AB	Sweden
Master Builders Solutions GmbH Podružnica Zagreb za trgovinu	Croatia	MBS Polska Sp. z. o.o. – nuolatine buveine	Lithuania	Master Builders Solutions Schweiz AG	Switzerland
MBS CZ-SK s.r.o.	Czech Republic	Master Builders Solutions Nederland B.V.	The Netherlands	Master Builders Solutions UK Ltd.	UK
Master Builders Solutions Denmark A/S	Denmark	MB Solutions New Zealand Limited	New Zealand	Great Lakes Polymer Technologies, LL	US
Master Builders Solutions Finland Oy	Finland	Master Builders Solutions Norway AS	Norway	Master Builders Solutions Admixtures US, LLC	US
Master Builders Solutions France S.A.S.	France	MBS Polska Sp. z. o.o.	Poland		

Below is the list of entities that joined Master Builders Solutions Group during the 2024 financial year. None had any production activities in 2024 as part of Master Builders Solutions Group except for Adril Traders S.L.

Entity joined during 2024	Location	Month joined in 2024	Data in this report included from 2024			
			Environment	Social	Governance ¹	Financial
MB Trading CA, S. de R.L. de C.V.	Mexico	May	Not included	May (full year)	May (full year)	May
Adril Traders S.L.	Spain	May	Included	May (full year)	May (full year)	May
MBT Construction Chemicals India Private Limited	India	August	Not included	August (full year)	August (full year)	August
MB Trading Brasil Servicos Administrativos LTDA ²	Brazil	November	Not included	November (full year)	November (full year)	November
MBT Teknik Yapı Kimyasalları Sanayi ve Ticaret Anonim Şirketi	Turkey	December	Not included	December (full year)	December (full year)	December

¹ Including training and SpeakUp data.

² By 31 December 2024 we had zero workers in Brazil and the location was operated by our Mexico team.

Report scope: entities excluded

None.

Certifications and coverage

	Europe & the UK	North America	Australia & New Zealand	Asia, Middle East, Turkey (AMET)	Latin America	Total sites (#)	Total sites (%)
# of production sites	18	13	5	1	0	37	100%
# of sites certified to ISO 9001 (Quality Management Systems)	15	12	4	0	0	31	83.8%
# of sites certified to ISO 14001 (Environmental Management System)	11	0	0	0	0	11	29.7%
# of sites certified to ISO 45001 (Occupational Health & Safety Management Systems)	2	0	0	0	0	2	5.4%

Sustainable procurement

We expect our suppliers to adhere to the same human rights, labour, anti-discrimination, anti-corruption, and environmental protection standards we maintain in our own operations. All our suppliers must commit to the Master Builders Solutions’ Supplier Code of Conduct, which specifies our approach to safety, human rights risks, and the environment. By the end of 2024, 100% of relevant suppliers have signed up to the Code.¹

Our sustainable procurement training programme for our buyers, launched in 2023, details the importance of social responsibility and human rights within the supply chain. It includes an introduction to greenhouse gas (GHG) emissions and the importance of collaboration with direct suppliers to obtain environmental product information, such as product carbon footprint, lifecycle assessment results, and information for environmental product declarations. By the end of 2024, 100% of our buyers have completed the training.

Sustainable procurement training target: 100% of buyers complete our sustainable procurement training programme

Baseline	Baseline value	Target year	Target value	2024 value
Q3 2023	0%	2024	100%	100%

Supply chain due diligence

As part of our sustainable procurement programme, launched in 2023, we assess the sustainability performance of potential new suppliers through risk identification, vendor selection, and evaluation processes. The screening covers 13 potential environmental, social, and governance (ESG) risks based on industry and location.

Our buyers are responsible for evaluating and selecting new suppliers, and we use third-party software to conduct our supply chain due diligence. In 2024, we screened more than 1,074 suppliers – both direct and indirect – accounting for more than 88% of our total spend during the 2024 financial year. The due diligence confirmed that our major suppliers (top 60% of spend) are in low-risk regions for forced or child labour, with relevant environmental regulations to ensure proper waste treatment and lower probability of environmental pollution.²

¹ We classify relevant suppliers as suppliers of critical materials and services representing more than 40% of our total supplier spend in 2024.

² The supply chain due diligence focuses on suppliers of the Master Builders Solutions brand, and does not yet include our other brands.

Alignment with global frameworks

We continue to align our efforts with internationally recognised sustainability initiatives, including:

- **EcoVadis certification.** In the latest EcoVadis assessment of our sustainability performance – and Master Builders Solutions’ first assessment as a standalone company – we achieved a Gold rating, placing us in the top 5% of companies in our sector.
- **UN Global Compact (UNGC).** We joined the UNGC in early 2024, which requires us to apply the 10 UNGC principles, covering anti-corruption, environment, human rights, and labour, in our strategy and operations, and publicly communicate our progress.
- **UN Sustainable Development Goals (SDGs).** We aim to align our efforts with the global UN goals where we can have the biggest impact, these include:
 - **SDG 8:** We promote inclusive and sustainable economic growth, full and productive employment, and decent work for all. We are committed to ensuring our employees’ health, safety and wellbeing. Highlights of 2024:
 - Global Safety Day for 100% of sites, with slips, trips and falls awareness training.
 - 45% of our employees covered by collective bargaining.
 - **SDG 9:** We contribute to innovations that supports more resilient and sustainable infrastructure while improving our own operations to reduce our negative environmental impact. In 2024:
 - 3% of total expenditure on innovation, R&D, and technical support.
 - **SDG 11:** Our products and services directly enable more sustainable construction and help reduce the volumes of concrete waste generated during construction and demolition. In 2024:
 - 790,000+ tonnes of returned concrete treated with MasterSuna® RCT for reuse, instead of ending up in landfill.
 - **SDG 12:** We follow best practice to reduce resource consumption, waste generation, and wastewater disposal within production. Our products and services enable responsible concrete production. 2024 highlights include:
 - 8.8% electricity consumption from renewable sources.
 - 15.9% reduction in wastewater per produced ton, compared to 2022 baseline.
 - **SDG 13:** The key focus of our products and services is to support the construction industry in its decarbonisation plans. We also committed to 15% reduction of our production-based emissions. In 2024, we:
 - Reduced production-based scope 1 and 2 emissions by 10.8% per tonne produced.

How our business is connected to the UN SDGs

Increasing positive effects



Use of byproducts and reuse of building materials



Supplier Code of Conduct



Increase R&D for innovation



Innovate for more sustainable buildings, local materials



Innovate for more sustainable infrastructure



Circular economy and waste reduction



Reducing negative effects



Optimise transport, reuse packaging



Equal pay, materials footprint



Reduce waste, particulate matter



Materials footprint, waste reduction, safe chemicals



Emissions and resource reduction



Optimise transport, reuse packaging



Resilient, lower-carbon structures, awareness, lifecycle assessments

Additional environment disclosures

Climate

Our Benelux team has set local emissions reduction goals, including an emissions intensity reduction target.

Benelux emissions intensity target: 80% reduction in scope 1 and 2 GHG emissions intensity (CO₂e/€) across our Benelux locations

Baseline year	Baseline value	Target year	Target value	2024 value
2017	0%	2028	-80%	-73%

GHG emissions reporting methodology

Master Builders Solutions has followed the GHG Protocol for our GHG emissions accounting and reporting, covering scopes 1, 2, and 3. We defined organisational boundaries using the GHG Protocol’s operational control approach, ensuring we account for 100% of the GHG emissions from operations over which we have control. We used the relevant GHG emission conversion factors from UK (DEFRA), US EEIO spend-based, US (Green-e), international (International Energy Agency and Association of Issuing Bodies) and Managed LCA content (by Sphera Solutions Inc.©) to convert the relevant data into GHG emissions. In market-based calculations, specific market-based factors are used, where available, via AIB (market-based factors for Europe) and US (Green-e). For the rest of the world, until residual mix emission factors are published for other countries, location-based (i.e., grid) emission factors are used.

Accounting policy

- Scope 1 emissions** include emissions from the use of refrigerant gases, natural gas and liquid fuels in stationary fuel combustion, and petrol and diesel in mobile fuel combustion. Fuel consumption is based on actual invoiced utility data and measured in cubic metres or litres. It was provided for each site where the company has operational control (owned and leased sites). Use of refrigerant gases was provided for each site in kg.
- Scope 2 emissions** include consumption of electricity at company sites and via electric car fleet. Master Builders Solutions does not purchase any steam. The company has disclosed dual scope 2 emission reporting, both location-based and market-based emissions to provide a comprehensive view of our impact. For electricity purchased using a green electricity tariff in Austria, Norway, Spain, and Switzerland only the emissions associated with electric power transmission and distribution losses are considered and the electricity production itself has been treated with zero emissions. Self-generated solar electricity in Australia, Italy, the Netherlands, Poland and Romania has been considered with zero emissions.
- Scope 3.** We have reviewed our total scope 3 GHG emissions based on The Corporate Value Chain (scope 3) Accounting and Reporting Standard set out in the GHG Protocol. Based on this analysis, the most significant category is **category 1: purchased goods and services** (extraction, production, and transportation of goods and services purchased or acquired and includes raw

materials, packaging, and services). Other categories identified as relevant include:

- **Category 2: Capital goods.** Extraction, production, and transportation of capital goods purchased.
- **Category 3: Fuel and energy-related activities.** Extraction, production, and transportation of fuels and energy purchased (combustion is accounted for in scopes 1 and 2).
- **Category 4: Upstream transportation and distribution.** Transportation and distribution purchased in the reporting year. This includes inbound logistics and outbound logistics, as we hire logistics providers to transport all our products downstream (i.e. to our customers), and transportation and distribution between company facilities. Category 9 (downstream transportation and distribution) is therefore not relevant to Master Builders Solutions.
- **Category 5: Waste generated in operations.** Disposal and treatment of waste generated at sites.
- **Category 6: Business travel.** Transportation of employees for business-related activities.
- **Category 7: Employee commuting.** Transportation used by employees to get to work and the emissions associated with working from home.
- **Category 8: Upstream leased assets.** Emissions from the operation of assets that we lease from others that are not already accounted for in scopes 1 and 2.
- **Category 10: Processing of sold products.** Processing / transformation of the intermediate products sold into their final state. This category includes estimated scope 1 and 2 emissions from processing.
- **Category 11: End of life treatment of sold products.** Scope 1 and 2 emissions from the disposal of concrete made including our products.
- **Category 13: Downstream leased assets:** Emissions from the operation of assets that we lease to others that are not already accounted for in scopes 1 and 2.

Spend, activity and distance-based methodologies were used to calculate emissions for relevant scope 3 categories.

In 2025, we implemented the Sphera Cloud Corporate Sustainability platform to calculate our GHG emissions and manage our ESG data.¹ This involved updating our emissions calculation methodology according to the GHG Protocol and several adjustments to improve historical (2023 and 2024) data, including:

Regarding our 2023 scope 1 and 2 data:

- We made several minor corrections to energy data. There are also possible differences between the emissions factors used in the newly implemented platform compared with the approach of our previous third-party provider.

¹ Powered by Sphera Solutions, Inc. © 2025.

Regarding our 2023 scope 3 data:

- The calculation methodology for categories 1, 2, 6, 10 and 12 did not change compared to 2023. The emission factors were re-mapped using public and private libraries available through our newly-implemented platform.
- The calculation methodology for categories 3 and 5 did not change compared to 2023. However, GHG values are slightly different due to several minor corrections to our 2023 energy and waste data.
- The calculation methodology for category 7 changed. The assumption for ‘commuting distance and mode of commuting’ changed, and we included the emissions associated with working in home office. Therefore, there was a significant change in this data compared to 2023 scope 3.7 number. The scope 3.7 emissions of 2023, disclosed in our previous sustainability report, is corrected in this report, see [page 27](#).
- The calculation methodology for categories 4 and 9 changed compared to 2023, from activity-based to a combination of activity- and spend-based. The decision was made based on the quality of our logistics data. We also determined that Master Builders Solutions only has GHG emissions associated with ‘upstream transportation and distribution’. Therefore, the 2023 GHG emissions are corrected in this report, and ‘downstream transportation and distribution’ emissions have been added to ‘upstream transportation and distribution’.
- Upstream and downstream leased assets are calculated using spend-based methods and US EEIO spend-based emission factors.

Pollution: own operations

We do not produce or release nitrogen oxides, carbon monoxide, or sulphur oxides, however we acknowledge the presence of some volatile organic compounds (VOCs) and dust in our processes. We address this by using advanced dust extraction systems to capture and reduce dust emissions effectively. All our production sites have an air emission inventory to identify sources of air pollution. We use monitoring systems, source-specific testing, material balance, emissions factor applications, or other estimation techniques, depending on context to calculate pollutant-specific emissions. Our workers are equipped with appropriate health and safety equipment to protect them from any potential exposure.

We monitor olfactory emissions to limit potential external impacts and aim to go beyond the emissions thresholds required by law. This proactive approach is designed to mitigate any adverse effects. Similarly, we monitor and report on any VOC emissions associated with our raw materials. The measured VOC content in our production sites was zero in 2024.

Water discharge: own operations

As part of our Environmental, Health, Safety, and Quality (EHSQ) Policy, our Environmental Protection and Energy Procedure establishes our standard guidelines for responsible wastewater management. Actions to manage and reduce our water discharges include:

- Installing wastewater treatment facilities to reduce wastewater volumes onsite.

- Disposal of solid waste from this wastewater treatment plants is done via certified third-party.
- Reusing wastewater generated from cleaning raw materials in the production of products that contain the same raw material.
- Using high-pressure washers to reduce the amount of polluted water during washing. For example, a truck washing facility and washwater reuse systems at our site in Lancaster, US, help to reduce the volume of water discharge.

Wastewater from production	2022 (new baseline) ¹	2023	2024	Δ from baseline (2022)
Wastewater (t)	279,890	211,111	189,911	-32.1%
Wastewater per produced ton (kg/t)	349.8	279.2	294.3	-15.9%

Waste: own operations

As part of our EHSQ Policy, our Environmental Protection and Energy Procedure establishes our standard operating procedures to support responsible waste management in line with the waste hierarchy. It is intended to complement our existing practices, providing examples, clarification and requirements to strengthen current initiatives. The Procedure encourages continuous improvement and the reduction

of waste wherever possible, while ensuring legal and regulatory requirements take precedence, except where Master Builders Solutions’ standards are more stringent.

We classify our hazardous or non-hazardous waste based on applicable laws and manage it accordingly. This applies to all waste generated in our facilities, including sludge, off-specification materials, returned or out-of-date products, contaminated packaging, and mineral waste from demolition and excavation. Ongoing actions to manage our operational waste include:

- Implementing the waste hierarchy to reuse, recover or repurpose materials and reduce our overall waste.
- Sorting and disposing of waste according to waste streams.
- Training employees on waste reduction and sorting best practices.

Waste from production	2021 (baseline)	2022	2023	2024	Δ from baseline (2021)
Hazardous waste (t)	3,168	1,724	2,959	2,000	-36.9%
Non-hazardous waste (t)	5,321	4,932	4,520	3,147	-40.9%
Non-hazardous waste per produced ton (kg/t)	6.8	6.2	6.3	4.9	-28.3%

¹ In 2024, one of our largest production sites improved its historical wastewater data, going back to 2022. It was not possible to update the 2020 and 2021 data in line with these improvements, and we have therefore reset our baseline from 2020 (as previously reported) to 2022.

Additional social disclosures

Collective bargaining agreements and work councils

We respect the right to freedom of association and collective bargaining to support trust and dialogue. In countries with legal restrictions on this right, we look to open communication within the framework of national law and local circumstances.

Employees must receive at least one day of rest every seven days. Local management is responsible for ensuring employees do not work more than their agreed hours. There can be local variations due to different shift models at our plants.

As of 2024, we have work councils in Belgium, Denmark, Finland, France, Germany, Italy, the Netherlands, Norway, Spain and Sweden. In Belgium, France, Italy, and Spain, all employees are covered by collective bargaining agreements.

	2023	2024
% of workforce represented by work councils	>42%	>41%
% of workforce covered by collective bargaining agreements	46%	45%

Employee training hours

Compliance and ethics	4,530
Equal treatment, diversity and inclusion	715
Environment, health and safety	11,753
Information security & IT	1,510
Career development – procurement and supply chain	67
Career development – products and services	740
Other topics, such as finance, HR, ESG	74
Total	19,389

Additional governance disclosures

Approach to tax

We are committed to complying with tax laws and regulations everywhere we operate, and to maintaining open and constructive relationships with tax authorities. We file our tax returns on time and make all necessary disclosures to the tax authorities, while claiming reliefs and incentives where available under law. Tax law can be subject to interpretation, in which case we interpret the applicable law with due consideration. We source external tax advice when needed to ensure we take tax positions that are grounded in prevailing opinions and relevant jurisprudence.

Our Global Head of Tax is responsible for the tax function. They regularly inform our Chief Financial Officer about all significant tax-related developments, including their current and future effect on the company's finances.

Our internal Tax Compliance Management System enables tax compliance and risk management. It supports the roll-out of tax guidelines and requirements across our business to ensure the compliance, reliability, effectiveness, and efficiency of our tax function. These guidelines are binding for all employees and provide the basis for the day-to-day work of all our employees who deal with tax matters. We provide regular training to raise awareness of the importance of tax compliance.

Group Audit

The Internal Audit function conducted 14 on-site audits in 2024, corresponding to 30.1% of workforce. Each covered various compliance topics, such as availability of SpeakUp posters and leaflets, training programmes, conflicts of interest, trade controls, equal treatment, and entertainment and gift policies. Some audits were conducted regularly following an audit plan for identified sites, and some were single audits on specific topics. Our annual audit plan is based on a risk model and includes audit requests by the Group Management Board. It can be adapted throughout the year as needed. Audit requests such as Compliance Audits take priority and replace other audits if necessary. All audits are planned around a general theme covering basic compliance risks and effectiveness of internal controls in administration and business processes, including finance, HR, sales, production, procurement, and IT. This gives Group Audit the flexibility to adapt audit topics to the risks encountered during fieldwork. Audits are usually conducted on site by one auditor within a maximum of three weeks.

