FMTG

FALKENSTEINER MICHAELER TOURISM GROUP

SUSTAINABILITY REPORT 2025

1 GENERAL INFORMATION

1. FOREWORD

Dear Readers,

Since 1957 we have taken a holistic view of tourism – from the initial project idea through planning and construction to day-to-day operations. This integrated approach remains the foundation of everything we do to this day: we assume responsibility not selectively, but along the entire value chain.

For us, responsibility means involving everyone who works with and for us – guests, employees, partners and the regions in which we operate. Respectful cooperation, transparent collaboration and reliable partnerships are, for us, not an add-on to economic success – they are its foundation.

Our group-wide sustainability strategy encompasses project development and hotel operations in equal measure. We are continuously expanding regional cooperation, have introduced group-wide energy monitoring and have continuously reviewed our sites against recognised standards. This results in clear objectives and measurable progress.

The past few years have shown that geopolitical uncertainties and rising energy prices have a direct impact on tourism. At the same time, the desire to travel remains unbroken – priorities are shifting towards safety, accessibility and regional proximity. For us, this means reacting with agility while investing in resilient structures for the long term. Sustainable business practices are not an isolated topic, but a prerequisite for corporate stability.

This report shows where we stand, what we have achieved – and where we still need to take further action. We invite you to read it.

Erich Falkensteiner
Chairman of the Supervisory Board

Otmar Michaeler
Chief Executive Officer (CEO)

Andreas Falkensteiner
Member of the Supervisory Board

Erich Falkensteiner
Chairman of the Supervisory Board

Otmar Michaeler
Chief Executive Officer (CEO)

2. FMTG AT A GLANCE

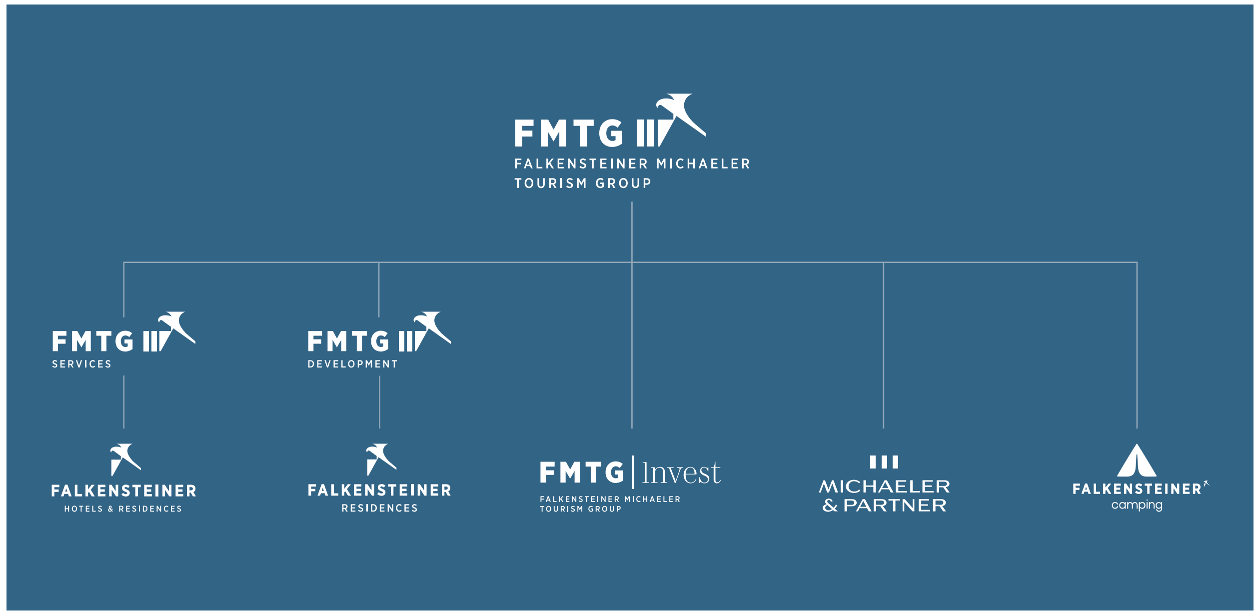


Fig. 1 – FMTG business units

Executive Board and Supervisory Board

Executive Board

- **Otmar Michaeler** – CEO

Supervisory Board

- **Erich Falkensteiner** – Member of the Supervisory Board and Chairman
- **Andreas Falkensteiner** – Member of the Supervisory Board
- **Thomas Döring** – Member of the Supervisory Board
- **Bianca Stojka-Davis** – Advisory Board member
- **Beat Blaser** – Advisory Board member

Executive Management

- **Christoph Crepaz** – Managing Director Marketing & Sales, FMTG Services
- **Till Schäfer** – Managing Director Finance, FMTG Services
- **Norbert Ratzinger** – Director Corporate Finance, Treasury & Group Reporting, FMTG AG
- **Roland Presetschnik** – Managing Director of Finance Development, FMTG Development

Our vision, mission, values and principles

Our vision is to be the leading 360° tourism group in Central and South-Eastern Europe.

Our mission is to live sustainable and innovative tourism – from planning through construction to operational management. This makes us a reliable partner for project developers, investors and banks. Our goal is to create unforgettable holiday experiences that turn guests into loyal fans of our brand.

Our values are based on 68 years of experience and our deep roots in the hospitality industry:

- **Driven for success** – We set ambitious goals, think big, and continuously evolve.
- **Grounded** – We are proud of our roots, act responsibly with resources, and respect human rights.
- **Courageous** – We embrace challenges, stay curious, and strive for constant improvement.
- **Relationship-oriented** – We foster strong, trusting relationships with our guests, partners, and employees.

Our principles guide our daily actions and ensure that our values are consistently put into practice:

- **Warmth** – We meet colleagues, guests, and partners with openness, friendliness, and respect.
- **Passion** – We dedicate ourselves with enthusiasm and commitment to the well-being of guests and employees.
- **Perfection** – We consistently strive for the highest quality and excellence across all areas of the company.
- **Creativity** – We encourage innovation and creative solutions for sustainable growth.
- **Responsibility** – We assume responsibility for the environment, our employees, and society.
- **Efficiency** – We work efficiently and use resources responsibly to achieve sustainable results.
- **Authenticity** – We remain true to our roots and traditions, acting with honesty and transparency.

Corporate culture

Respectful interaction with one another is an essential part of our corporate culture. We value a family-like working atmosphere that is characterised by trust, openness and mutual appreciation. Our company promotes diversity and equality by treating all people fairly, regardless of gender, origin, age, religion or sexual orientation.

We ensure that our business relationships and partnerships are characterised by mutual respect, integrity and trust. We reject any form of discrimination, corruption or unethical behaviour. We comply with applicable laws and regulations and are committed to responsible action in our industry.

We also call on all employees to actively contribute to a respectful and open corporate culture.

Further information on the topic of 'Corporate culture' can be found in the chapter on Governance Information.

Roomnights

853,728*

(incl. hotels, camping + residences)

Assets under Management:

approximately

1 bn

Bednights

2,058,566*

Residences projects

3

Camping sites

6

FACTS & FIGURES 2025

4- & 5-star hotels

27

Managed revenue

261 m*

Development pipeline until 2028 / 2029

400 m

CO_2 emissions**

5.7* $kgCO_2$/BN

* excl. Belgrade & Falkensteiner Hotels Ldo. Anthelo, Falkensteinerhof & Sonnenparadies

** Scope 1 & 2 per bednight

3. ESG HIGHLIGHTS & ACHIEVEMENTS

AUSTRIAN ECOLABEL & EU ECOLABEL

FMTG works continuously to further develop its environmental and social performance within its accommodation operations. A key lever for this is the ongoing and gradual expansion of recognised sustainability certifications, in particular the EU Ecolabel and the Austrian Ecolabel, in order to make progress measurable and transparent.

The EU Ecolabel is a voluntary environmental label of the European Union that distinguishes accommodation operations with high standards in the areas of energy efficiency, resource conservation, water management and waste avoidance. The underlying criteria are updated regularly and promote a continuous improvement of environmental performance along core operational processes. In the 2024 reporting year, the Falkensteiner Resort Punta Skala – consisting of the Falkensteiner Hotel & Spa Iadera and Falkensteiner Hotel Diadora – as well as the Falkensteiner Hotel Montafon were certified with the EU Ecolabel. In the 2025 financial year, the following hotels were certified:

- Falkensteiner Schlosshotel Velden
- Falkensteiner Hotel & Spa Carinzia
- Falkensteiner Club Funimation Katschberg
- Falkensteiner Hotel Cristallo
- Falkensteiner Hotel Bad Leonfelden
- Falkensteiner Hotel Schladming
- Falkensteiner Hotel Sonnenalpe
- Falkensteiner Balance Resort Stegersbach

In addition, FMTG relies on the Austrian Ecolabel, an established quality seal that, alongside ecological aspects, also takes into account social aspects such as fair working conditions and regional value creation. The certification comprises extensive requirements for sustainable operational management and includes regular reviews. In 2025, the certification was extended to all Austrian hotel operations.

Fig. 2 – Facts & figures 2025

With the certification of all its Austrian hotels under the Austrian Ecolabel and the EU Ecolabel, FMTG marks an important milestone towards sustainable hotel operations.

The following hotels were (re)certified in 2025:

- Falkensteiner Schlosshotel Velden
- Falkensteiner Hotel & Spa Carinzia (recertification)
- Falkensteiner Club Funimation Katschberg (recertification)
- Falkensteiner Hotel Cristallo (recertification)
- Falkensteiner Hotel Bad Leonfelden
- Falkensteiner Hotel Schladming
- Falkensteiner Hotel Sonnenalpe
- Falkensteiner Balance Resort Stegersbach

Two of FMTG's hotels, the Falkensteiner Schlosshotel Velden and the Falkensteiner Hotel Montafon, are part of The Leading Hotels of the World (LHW), an international association of independent luxury hotels that meet strict quality standards and are distinguished by individuality and a high level of service quality.

With the "Sustainability Leaders" category, LHW highlights those member hotels that stand out through a particularly comprehensive commitment to sustainability. This is based on defined criteria in the areas of environmental management, social responsibility and governance, compliance with which is reviewed regularly in order to ensure a continuous improvement of sustainability performance.

The Falkensteiner Hotel Montafon is already recognised as a Sustainability Leader; as a result of the Falkensteiner Schlosshotel Velden achieving the Austrian Ecolabel, it is expected that this hotel will also be recognised as a Sustainability Leader in the future.

Through the targeted expansion and renewal of these certifications, FMTG creates a robust basis for developing its sustainability performance in a structured manner and documenting it transparently. With the successful certification of its entire Austrian hotel portfolio, FMTG has reached a milestone and demonstrates its clear commitment to sustainable hotel operations.

SOCIAL ACHIEVEMENTS & AWARDS

BEST-PRACTICE HIGHLIGHTS IN OUR HOTEL OPERATIONS IN THE AREA OF PEOPLE DEVELOPMENT

In the 2025 financial year, FMTG further expanded its activities in the areas of **People Development (PD)**, talent development and operational quality improvement. The focus was on strengthening employer attractiveness, the targeted development of internal talent, and ensuring group-wide quality standards across operational areas.

Highlights:

- In 2025, FMTG strengthened its employer attractiveness by expanding People Development (PD), Youngstar programmes, leadership training and group-wide on-the-job coaching.
- The number of Youngstars rose from 22 in 2021 to 41 in 2025, an increase of 19 Youngstars, or around 86%. Compared with 2024, this represents an increase of around 17%.
- The effectiveness of the measures was reflected, among other things, in seven Junior Skills medals as well as in renowned Human Resources awards (HR Awards), including 1st place at the HR Inside Award and 2nd place at the Constantinus Award.
- At the same time, group-wide quality standards were further consolidated through Mystery Checks, Brand Standards, Leading Quality Assurance (LQA), guest-journey training and operational coaching.

Overall, the 2025 Social Achievements show that FMTG actively fulfils its social responsibility towards employees through structured development, the promotion of young talent, internal career paths, leadership development and quality enablement. The development of the Youngstar figures, the received HR awards and the success in vocational training confirm the chosen path and strengthen FMTG's positioning as an attractive employer in the tourism and hospitality sector.

FALKENSTEINER YOUNGSTARS PROGRAMME

A particular focus each year – and thus also in 2025 – is on the Youngstars programme, through which young talents are supported, mentored and integrated into the corporate culture at an early stage. The number of Youngstars rose from 22 in 2021 to 41 in 2025. This corresponds to an increase of 19 Youngstars, or around 86%. Compared with 2024, the figure increased from 35 to 41 Youngstars, i.e. by 6 people, or around 17%.

The programme comprises training courses, team days, exchange programmes and targeted development formats for apprentices and junior staff. In terms of content, the focus is on teamwork, communication skills, personal development, self-confidence, learning competence, values orientation and group-wide exchange. In addition, international exchange formats were implemented that offer young employees additional learning and development opportunities within the group.

LEADERSHIP AND HOD DEVELOPMENT

In addition, leadership and HOD development (Head of Department) was further professionalised. FMTG pursues a structured development approach ranging from onboarding through on-the-job training to Leadership Development, Leadership Expertise and Ideathons. The aim is to strengthen leadership skills, expand internal development paths and systematically pass on knowledge within the group. The programmes support in particular HODs (Heads of Department), GMs (General Managers) and operational managers in leading teams effectively, ensuring service quality and embedding the “Falkensteiner values” in everyday working life.

TRAINING AND SUPPORT IN OPERATIONS

Extensive measures were also implemented in the area of training and operational support in 2025. The Quality, People Development and Operations team (QPD & Ops) was deployed group-wide for more than 900 travel days. The activities comprised training courses, Youngstar training and Ideathons, on-the-job coaching as well as operational support for new openings, seasonal openings and the implementation of standards. In this way, the continuous competence development of employees was directly linked to operational quality assurance and guest focus.

AWARDS AND DISTINCTIONS

In 2025, FMTG was also able to win renowned Human Resources awards (HR Awards). Particularly noteworthy are 1st place at the HR Inside Award and 2nd place at the Constantinus Award. In addition, in the Youngstar context, the Employer Branding Award is reported as a further success. These awards confirm the strategic development of the employer brand, the investments in junior talent promotion and the group-wide importance of People Development as a central component of the ESG agenda.

A further success is reflected in the professional achievements of the junior staff: within the framework of the Youngstar Success Stories, seven medals at Junior Skills are listed. These results underline the effectiveness of the training and development measures and show that FMTG not only mentors young talents but actively enables them to achieve professional excellence.

FURTHER QUALITY REQUIREMENTS AND INSTRUMENTS

In parallel, group-wide quality requirements and instruments were further deployed and sharpened. These include, among others, Mystery Checks, Brand Standards, Action Plans, the Falkensteiner Guest Journey, Leading Quality Assurance Standards (LQA standards), Brand Implementation Standards (BIS), operational quality checks as well as department-specific training in Front Office, Housekeeping, Food & Beverage (F&B), Culinary, Spa, Animation & Entertainment (A&E) and Sport & Active. These measures serve to systematically ensure service quality, process clarity, hygiene, guest communication, complaint management and operational excellence.

Fig. 3 – FMTG's relevant SDGs

4. CONTEXT & FRAMEWORKS

SDGS AND THE EUROPEAN GREEN DEAL

The Sustainable Development Goals (SDGs)

The 17 Sustainable Development Goals (SDGs) were adopted in 2015 by the United Nations (UN) as part of the 2030 Agenda. They serve as a global, universal action plan to promote prosperity, social progress, and environmental protection, with the overarching goal of ending poverty in all its forms and ensuring sustainable development by 2030.

FMTG focuses its activities on SDGs 3, 5, 6, 7, 9, 12, and 17, which are highlighted in colour in the graphic:

The European Green Deal

The European Green Deal is the comprehensive growth strategy of the European Union, introduced in December 2019. Its aim is to make Europe the first climate-neutral continent by 2050, decoupling economic growth from resource use and ensuring that no one is left behind.

Principles of the European Green Deal:

- **Climate neutrality by 2050:** Achieving net zero greenhouse gas emissions ("net zero") across the EU by mid-century.
- **Growth and environmental protection:** Promoting a resource-efficient, competitive economy while preventing negative environmental impacts.
- **Just transition:** Ensuring social justice, inclusion, and economic opportunities for all during the transformation towards a green economy.
- **Protection of natural resources:** Restoring and preserving biodiversity and ecosystems as the foundation of a resilient planet.

Objectives of the European Green Deal:

- **Reduction of net greenhouse gas emissions by at least 55% by 2030 compared to 1990.**
- **Promotion of clean energy sources and improvement of energy efficiency.**
- **Development of a competitive, climate-neutral circular economy.**
- **Protection of ecosystems and biodiversity through sustainable land use and forestry.**
- **Promotion of sustainable mobility and intelligent transport systems.**
- **Implementation of a "farm-to-fork" strategy for sustainable food production.**
- **Improvement of air and water quality and reduction of environmental pollution.**
- **Financing of sustainable investments and support for innovative technologies.**

Our contribution to achieving the SDGs and the European Green Deal

FMTG's initiatives and strategy are specifically designed to contribute to the realisation of the SDGs and the objectives of the European Green Deal. By embedding sustainable practices across all business processes, we aim to achieve measurable ecological, social, and economic impact.

We acknowledge our responsibility as an internationally operating tourism company to develop and implement innovative solutions that contribute both to climate protection and to a fair, resilient, and sustainable future. This commitment is an integral part of our corporate strategy and our ongoing dedication to sustainability.

EU REGULATORY FRAMEWORK

In its sustainability reporting, FMTG is guided to a significant extent by the regulation issued by the European Union as part of the Green Deal.

The focus is on the following legal frameworks:

- Directive (EU) 2022/2464 of 14 December 2022, specifically the Corporate Sustainability Reporting Directive (CSRD in short) regarding the sustainability reporting of undertakings,
- Delegated Regulation (EU) 2023/2772 with its standards for sustainability reporting,
- Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment (the EU Taxonomy Regulation in short).

Corporate Sustainability Reporting Directive (CSRD) and European Sustainability Reporting Standards (ESRS)

The CSRD aims to standardise, harmonise, and make sustainability reporting transparent at the European level for companies of a certain size. Reporting focuses on both general and topic-specific information in the areas of environment, social, and governance (ESG), identified as material. The CSRD itself, as a directive, provides only the framework, which is detailed through the mandatory European Sustainability Reporting Standards (ESRS).

In the course of the Omnibus packages in 2025, far-reaching adjustments to the CSRD were adopted with the aim of simplifying EU regulation and strengthening competitiveness. These concern in particular the scope of application as well as the content requirements of the ESRS. In addition to a postponement of the entry into force for undertakings in the second reporting wave (the "stop-the-clock" mechanism), which also affected FMTG, the thresholds for the reporting obligation as well as the scope of the disclosure obligations were revised.

Owing to the amended size criteria, FMTG currently no longer falls within the mandatory scope of application of the CSRD. Notwithstanding this, the group has – continuing its 2024 reporting – decided once again to report voluntarily for the 2025 financial year and according to the ESRS in the versions applicable as at the reporting date.

In parallel, a revision of the ESRS towards simplification ("Simplified ESRS") is underway at European level. At the time of preparing this report, only a draft was available. The content adjustments envisaged therein have already been partially taken into account in the present report. Full integration will take place once the revised standards have been finalised and officially adopted.

EU Taxonomy Regulation

The EU Taxonomy is another key pillar of the European Green Deal. It is a classification system that allows companies to classify certain economic activities, as defined in the regulation, as "environmentally sustainable" or "taxonomy aligned" if they meet certain criteria. The overarching goal is to direct financial flows towards environmentally sustainable investments and thereby promote "green" investments. The Taxonomy addresses six environmental objectives[1].

[1] 1. Climate change mitigation, 2. Climate change adaptation, 3. Sustainable use and protection of water and marine resources, 4. Transition to a circular economy, 5. Pollution prevention and control, 6. Protection and restoration of biodiversity and ecosystems

To achieve Taxonomy alignment, a substantial contribution must be made to at least one of the objectives, while not significantly harming the others. In addition, minimum social safeguards must be met.

The presence of taxonomy-aligned activities is intended to enhance attractiveness among customers, business partners, and investors, while also offering financing benefits and long-term competitive advantages.

The EU Taxonomy is also affected by changes relating to the already mentioned "Omnibus" initiative of the EU Commission. In the course of this, restrictions to the scope of application, relief in meeting the technical screening criteria as well as simplifications of the reporting on taxonomy-relevant key figures were likewise adopted, and some points are currently still being finalised.

Details on the EU Taxonomy and on FMTG's taxonomy-relevant economic activities are provided in the chapter on "Environmental information".

FMTG's corporate carbon footprint goes beyond a mere inventory – it provides data to better understand the company's own emissions, identify areas for action and develop targeted reduction measures

GREENHOUSE GAS ACCOUNTING ACCORDING TO THE GREENHOUSE GAS (GHG) PROTOCOL

Transparent and consistent recording of greenhouse gas emissions is a central foundation of effective climate strategies and a key element of FMTG's corporate sustainability responsibility. In this context, the Greenhouse Gas Protocol (GHG Protocol) has established itself as the internationally recognised framework for greenhouse gas accounting. It was jointly developed by the World Resources Institute (WRI) and the World Business Council for Sustainable Development (WBCSD) and today represents the leading global standard for determining, classifying, and reporting GHG emissions at the corporate level.

In light of increasing regulatory requirements – such as CSRD – and growing expectations from investors, customers, and other stakeholders, GHG accounting according to the GHG Protocol is gaining importance. For FMTG, applying the GHG Protocol is not only a tool for meeting regulatory obligations, but also a strategic management instrument for identifying reduction potentials, deriving science-based climate targets, and continuously improving the company's greenhouse gas balance.

The GHG Protocol systematically categorises emissions into three scopes:

- Scope 1: direct emissions,
- Scope 2: indirect energy-related emissions, and
- Scope 3: other indirect emissions along the value chain.

This structure enables comprehensive and comparable recording of climate-relevant emissions across all business activities and supply chains. For FMTG, which adheres to the European Sustainability Reporting Standards (ESRS) and the EU Taxonomy, the GHG Protocol provides the methodological foundation to present its emissions balance in a compliant and verifiable manner.

FMTG's group-wide Corporate Carbon Footprint (CCF) is provided in the "Environmental information" chapter.

In 2025, FMTG is consistently improving its data foundation – making its metrics more robust and more transparent.

5. BASIS FOR PREPARATION

GENERAL BASIS FOR PREPARATION OF THE SUSTAINABILITY STATEMENT

BASIS FOR PREPARATION

[ESRS 2 BP-1]

This sustainability report of Falkensteiner Michaeler Tourism Group AG covers the financial year 2025 and has been prepared on a consolidated basis.

Hereinafter, the entire group of companies covered by the sustainability statement is abbreviated as "FMTG."

EXPLANATIONS FOR CONSOLIDATED SUSTAINABILITY STATEMENTS

The sustainability statement includes all fully consolidated companies with Falkensteiner Michaeler Tourism Group AG as the (group) parent company. The scope of consolidation corresponds to that of financial reporting.

FMTG Services GmbH, as a (fully) consolidated subsidiary, is exempted from the annual and consolidated sustainability reporting.

VALUE CHAIN COVERAGE

According to ESRS requirements, the upstream and downstream value chain was particularly covered in the materiality analysis, especially when identifying material impacts, risks, and opportunities.

When calculating Scope 1-3 emissions according to ESRS E1 as well as social indicators according to ESRS S standards, group companies not fully consolidated in the sustainability statement were also taken into account, particularly when FMTG had operational control over the businesses.

When considering and analysing the value chain, the EFRAG guidance ("EFRAG IG 2 - Value Chain") from May 2024 was also used, which provides valuable assistance in determining the reporting boundaries and scope of emissions according to the GHG Protocol.

DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

[ESRS 2 BP-2]

ESTIMATES REGARDING THE VALUE CHAIN AND SOURCES OF ESTIMATES AND UNCERTAINTY OF RESULTS

[ESRS 2 BP-2.10 f.]

For the calculation of the following environmental, social, and governance indicators, reliable data sources within FMTG's sphere of influence were used wherever available.

In the area of "Environmental", the indicators for electricity, heating, cooling, and water consumption were taken from the group-wide consumption data monitoring system "EUDT." In those hotel or camping businesses where the system had not yet been implemented or was not technically available, data was collected through manual meter readings or based on supplier invoices.

Recording of CO_2 emissions from business travel:

The business travel of all FMTG employees in the 2025 financial year was recorded group-wide and entered into the ESG software Code Gaia. Based on the kilometres travelled – differentiated by means of transport (car, airplane, train, public transport) – the resulting CO_2 emissions were calculated. The collection of travel distances was carried out manually by queries in the respective businesses and documented and evaluated to the best of our knowledge and belief.

Collection and evaluation of waste data according to ESRS E5:

The indicators on resource consumption – especially in the area of waste – disclosed under ESRS E5 Resource Use and Circular Economy were collected using different methods.

Waste data was not comprehensively recorded digitally in 2025; the collection was therefore carried out manually in all hotel and camping operations of FMTG. The evaluation is based on a combination of different data sources: waste data reported by the accommodation operations, invoices from waste-disposal companies as well as extrapolations based on comparable FMTG operations. Expenditure-based data was not used for the 2025 financial year in order to work exclusively with quantity-based information.

The quality of the waste data varies considerably from market to market, as the national waste-management systems are developed and structured differently. At some sites, especially in Italy and Croatia, quantity data is not shared with the accommodation operations, or the costs for waste disposal are charged according to a per-square-metre allocation key rather than on the basis of the waste quantities actually generated. Information on recycling rates was partly available at operations in Austria and Italy; in other markets this information was not available.

In cases where the specific type of waste disposal was not known, a global disposal type of landfill without energy recovery was assumed as a precaution. A conservative approach was applied deliberately, so as not to present FMTG in an unduly favourable light.

Realistically, the actual recycling rate is likely to be higher, but FMTG has decided to use exclusively robust and traceable data sources for the reporting according to ESRS E5-5 Resource outflows.

Clear responsibilities, regular reporting and pooled expertise form the foundation of sustainability governance at FMTG.

6. GOVERNANCE

INTRODUCTION

The purpose of this chapter is to provide an understanding of how sustainability aspects are organisationally embedded within FMTG and on what basis they are monitored, managed, and assumed as a responsibility.

The focus is on the organisational structure, responsibilities, and internal control processes that ensure environmental, social, and governance topics are systematically incorporated into corporate decisions, risk management, and the strategic management of FMTG.

THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

[ESRS 2 GOV-1]

DIVERSITY OF THE HIGHEST BODIES

Executive Board

The Executive Board, consisting of a single male member, represents the highest management body of FMTG AG.

Supervisory Board

The Supervisory Board consists of three permanent members, including two regular members and the Chairman. All members are male. All members of this body, i.e. 100%, are independent and not bound by instructions. In addition, the Supervisory Board is supported by an Advisory Board in an advisory capacity. This consists of two members, one female and one male.

Other

Employee and workforce representatives are not part of the company's administrative, management, or supervisory bodies. All members of the Executive Board and the Supervisory Board can look back on many years or even decades of experience in the leisure and tourism industry.

RESPONSIBILITIES OF THE ADMINISTRATIVE, MANAGEMENT, AND SUPERVISORY BODIES

[ESRS 2 GOV-1.22 a) & b); G1-GOV-1]

The Executive Board and the Supervisory Board regularly monitor the material impacts, risks, and opportunities in the ESG area of FMTG. At the same time, the Executive Board is responsible for the overall strategic management of the company, including the implementation of the ESG and sustainability strategy, taking into account impacts, risks, and opportunities.

DEVELOPMENT OF SKILLS AND EXPERTISE IN THE AREA OF SUSTAINABILITY

[ESRS 2 GOV-1.23]

Management as well as the entire Supervisory Board possess a fundamental understanding of sustainability aspects, which is expanded in at least semi-annual meetings. In addition, all aspects of corporate governance are regularly addressed within the two bodies.

Both bodies may also draw on the expertise of the department within FMTG responsible for ESG and sustainability matters, Michaeler & Partner GmbH, which is also a fully consolidated subsidiary of FMTG.

Within the framework of regular, at least semi-annual meetings, as well as joint workshops accompanied by Michaeler & Partner – such as in the course of the materiality analysis conducted in FY 2024 – understanding, functionality, and interrelation with impacts, risks, and opportunities in the sense of CSRD and ESRS were conveyed.

TOPIC-RELATED REQUIREMENTS

[ESRS 2 Appendix C in conjunction with GOV-1]

BUSINESS CONDUCT

[G1-GOV-1.5]

The topic-specific requirements according to ESRS G1-GOV-1 have already been met in the above information on ESRS 2 GOV-1

SUPERVISORY AND MANAGEMENT LEVEL

SUPERVISORY BOARD | **MANAGEMENT BOARD + EXECUTIVE BOARD**

- Approval and monitoring of the ESG strategy
- Recipient of information on the status of the ESG strategy implementation

STRATEGIC-OPERATIONAL LEVEL

ESG-TEAM

- Development of the ESG strategy & reporting to the Management Board, ExCo & Supervisory Board
- Steering of the ESG strategy, implementation & correction following adjustments to regulation or market requirements
- Support for the ESG strategy implementation of the corporate departments & hotel and camping operations
- Sustainability reporting according to the CSRD for FMTG AG

ESG OPERATIONAL TEAM
M & P ESG, HR, Marketing, Communications, Purchasing, Hotels, Camping, Development

- Support in developing the ESG strategy or sub-concepts for the respective areas
- Implementation & steering of the ESG strategy implementation in the respective area

OPERATIONAL LEVEL

FMTG CORPORATE-DEPARTMENTS
Responsible: Head of Department
Implementation: ESG Lead

FMTG HOTEL- & CAMPING OPERATIONS
Responsible: General Manager
Implementation: ESG Lead

- Implementation of the detailed concepts with measures at the level of the hotel and camping operations & corporate level
- Input in the development of detailed concepts (GM and/or ESG Lead)

Fig. 4 – ESG Governance FMTG

INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

[ESRS 2 GOV-2]

The governance structure shown in the graphic illustrates how the ESG and sustainability area is embedded within the FMTG group. The structure ensures that environmental, social, and governance topics are systematically incorporated into corporate decisions, risk management, and strategic management.

- ESG and sustainability are embedded at the level of the Supervisory Board, Group Management/Management level, and at the strategic-operational level. This ensures resources, knowledge, and input at the highest level necessary to engage with key internal and external stakeholders and to continuously improve sustainability performance.
- The Executive Board, as the highest management body, is informed at regular intervals, but at least semiannually, about the development and progress of material sustainability aspects. In the reporting period 2025 there was no significant change related to FMTG's material IROs. The members of the Supervisory Board, as the supervisory body of the Executive Board of FMTG AG, are also informed in the context of regular Supervisory Board meetings, but at least semi-annually, about efforts and developments with regard to sustainability aspects.
- Accordingly, both bodies are informed about the material impacts, risks, and opportunities (see disclosure requirement ESRS 2 SBM-3), the implementation of due diligence in the area of sustainability, and the results and effectiveness of the adopted concepts, measures, parameters, and targets. They also receive regular updates on sustainability-related regulations that directly or indirectly affect FMTG.
- In addition, the Executive Board and members of the Supervisory Board actively dealt with all material impacts, risks, and opportunities of FMTG during the reporting period and took them into account in monitoring strategy, decisions on important transactions, and the risk management process. A corresponding, complete list can be found in the context of disclosure requirement ESRS 2 SBM-3 and in the topic-specific information.

At FMTG, ESG is not imposed from above but lived as a shared process – from the Executive Board through to the hotel employees, everyone is invited to actively help shape the transformation journey

- To support the implementation of the Corporate Sustainability Reporting Directive (CSRD), the internal business unit Michaeler & Partner ESG was commissioned. It consists of proven experts with many years of experience in sustainability reporting. They are responsible for drafting, implementing, and continuously developing the FMTG's ESG strategy, involving all relevant departments and accommodation businesses. Together, they form the ESG Operational Team.
- All corporate departments as well as hotel and camping businesses each have an ESG Lead. These are essential for the implementation of measures as well as for the development of detailed concepts and actions. They are therefore important not only for execution but also play a key role in providing impulses and measures from the businesses for the continuous further development of the strategy.

INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

[ESRS 2 GOV-3]

TOPIC-RELATED REQUIREMENTS

[ESRS 2 Appendix C in conjunction with GOV-3]

CLIMATE CHANGE

[E1-GOV-3.13]

In the reporting period, no climate-related considerations were included in the remuneration of the members of the administrative, management, and supervisory bodies. Performance was also not assessed on the basis of GHG emission reduction targets (E1-4).

7. DUE DILIGENCE AND RISK MANAGEMENT

STATEMENT ON DUE DILIGENCE

[ESRS 2 GOV-4]

FMTG acknowledges its corporate due diligence and is committed to upholding human rights as well as social and environmental standards along the entire value chain. In line with its Code of Conduct, the Group identifies potential risks, raises employee awareness through training, and binds business partners to its principles. Reports of potential violations are received confidentially, carefully examined, and necessary measures initiated. In this way, FMTG ensures that responsible action is an integral part of its business activities.

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENT
a) Embedding due diligence in governance, strategy and business model	Description under GOV-1 and GOV-2, pp. 24 ff. and 27 f.
b) Engaging with affected stakeholders in all key steps of due diligence	IRO-1 Double materiality assessment, pp. 42 ff.
c) Identifying and assessing adverse impacts	IRO-1 Double materiality assessment, pp. 42 ff.
d) Taking actions to address those adverse impacts	Report content on material topics in Environmental, Social & Governance information, pp. 58 ff., 110 ff. and 148 ff.
e) Tracking the effectiveness of these efforts and communicating	Report content on material topics in Environmental, Social & Governance information, pp. 58 ff., 110 ff. and 148 ff.

Due diligence and a forward-looking risk assessment strengthen the resilience of the business model – towards climate risks as well as towards regulatory and market-side changes.

RISK MANAGEMENT AND INTERNAL CONTROLS OVER SUSTAINABILITY REPORTING

[ESRS 2 GOV-5]

Climate risks

FMTG uses an online tool of the globally operating reinsurer Munich RE for the identification and subsequent assessment of physical climate risks. This enables the Group to determine its exposure to climate risks and natural disasters. These analyses serve, among other things, as a basis for identifying measures at the level of hotel and camping operations to increase the resilience of business activities.

Transition risks

To identify relevant transition risks (= risks arising from the transition to a climate-neutral and more sustainable economy), the following approach was taken:

First, internal and external stakeholders were surveyed as part of the double materiality analysis to understand their expectations and risk assessment.

In addition, the Finance department was involved in assessing the financial effects of transition risks, always taking into account a defined threshold in order to capture only relevant and material financial effects.

During the reporting period, Michaeler & Partner began to expand the identification of transition risks for FMTG in a targeted manner and to systematically analyse key influencing factors from regulation, market and technology. This supports FMTG in proactively addressing the shift towards a climate-neutral and more sustainable economy.

Internal control

The reporting was prepared by Michaeler & Partner in close coordination with all corporate departments as well as the accommodation businesses. Through ongoing joint exchange, data and content are continuously validated

8. FMTG'S STRATEGY AND BUSINESS MODEL

STRATEGY, BUSINESS MODEL AND VALUE CHAIN

[ESRS 2 SBM-1]

STRATEGY

CORPORATE STRATEGY

The special strength of FMTG derives from the fact that it covers the entire value chain. Thus, already when designing a project, the focus lies on the future management. In turn, the experience gained in the hotel operation adds to the development of new projects. Along with the profound industry know-how that we have gathered through our many years of practice and our strong hospitality roots, this vertical integration allows us to gain experience in all fields of the value chain and to create synergies that put us and our customers one step ahead of the competition. We are a "one stop shop" with a proven track record, both in the city hotel and holiday resort business. This makes us an attractive partner for project developers, investors and banks and enables us to achieve what is crucial to our business success: Create products that turn all our stakeholders into loyal fans of our brand.

ESG STRATEGY

For FMTG, sustainability is not a secondary aspect but a central strategic guideline for the future-proof development of the entire group. FMTG's ESG strategy, formally adopted in 2025, sets out the material fields of action, objectives and implementation approaches in the areas of Environment, Social and Governance. It serves as a frame of reference for operational and strategic decisions and, at the same time, forms the basis for measurable, integrated sustainability management.

The ESG strategy is designed to reconcile environmental and social responsibility with economic success. It supports FMTG's long-term resilience, fosters the trust of stakeholders and contributes to meeting legal as well as societal expectations.

The strategy follows a thematic structure along the three ESG dimensions, begins with an overarching strategic classification and then focuses on those topic areas that were identified as particularly material for FMTG.

The targets set within the framework of the strategy are, on the one hand, quantitative targets whose implementation is measured by clear metrics and, on the other hand, qualitative targets that reflect FMTG's stance and its fundamental orientation. The continuous further development of the Environment, Social and Governance areas requires dynamic targets; the targets set out in this strategy are therefore continuously adapted in order to ensure their accuracy and feasibility.

The relevant strategic content for each ESG topic area can be found in the thematic sections further below.

THE BUSINESS MODEL AND BUSINESS FIELDS OF FMTG AG

FALKENSTEINER MICHAELER TOURISM GROUP AG

FMTG – Falkensteiner Michaeler Tourism Group AG is one of the leading privately owned Austrian hospitality and tourism companies. In the 2025 financial year, it combined under its umbrella the areas of Falkensteiner Hotels & Residences with currently 27 four- and five-star hotels, three apartment complexes and two premium campsites, FMTG Development, FMTG Invest, and the consulting company Michaeler & Partner. Its activities extend across 6 European countries.

In the 2025 reporting period, FMTG employed an average of 2,428 employees. The regional distribution of the employees is as follows:

- **Austria:** 956 employees
- **Croatia:** 805 employees
- **Italy:** 487 employees
- **Czech Republic:** 144 employees
- **Slovakia:** 32 employees
- **Slovenia:** 4 employees

Further details on FMTG's employees are provided in the section Social information – 1. Own workforce.

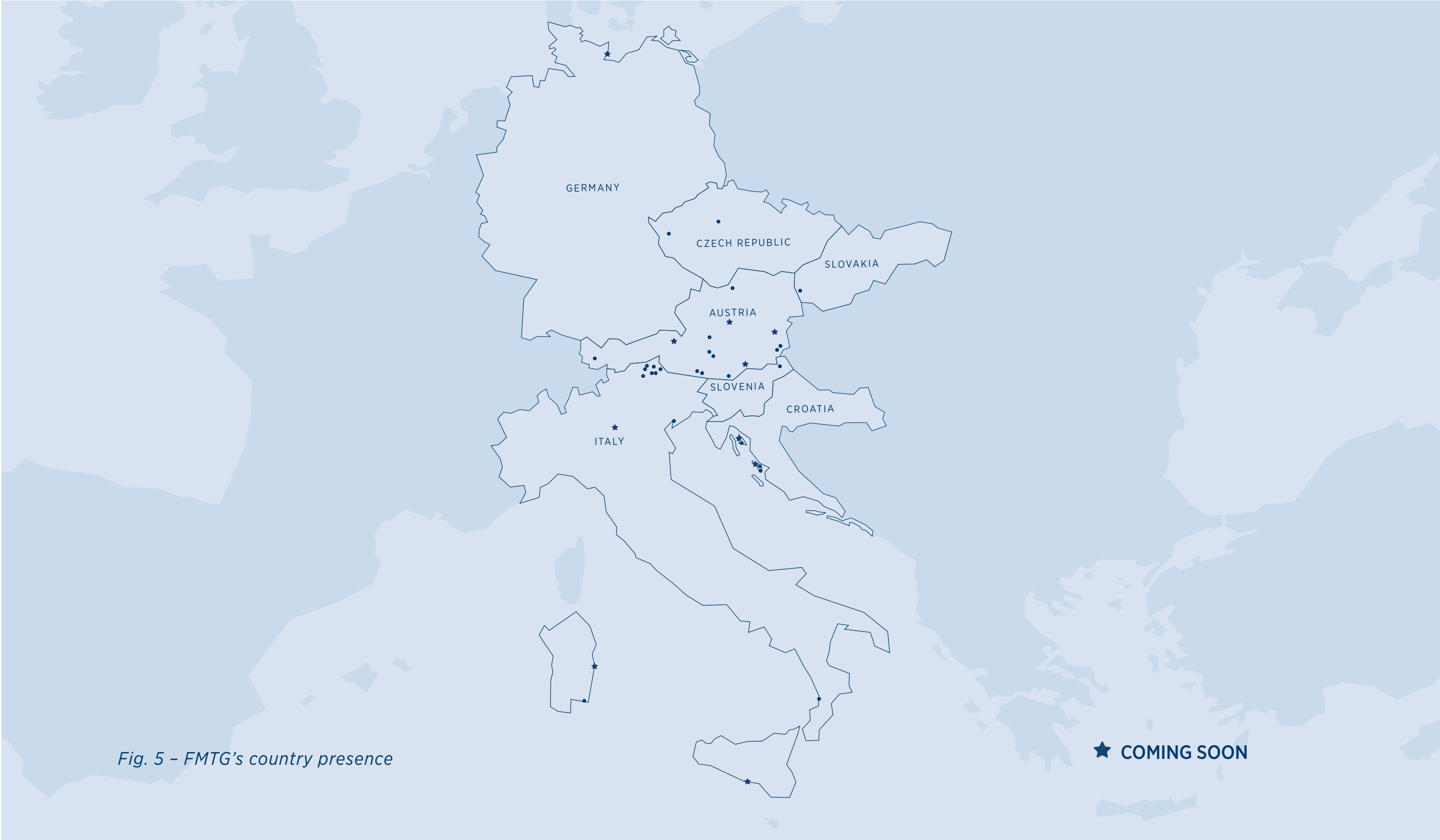
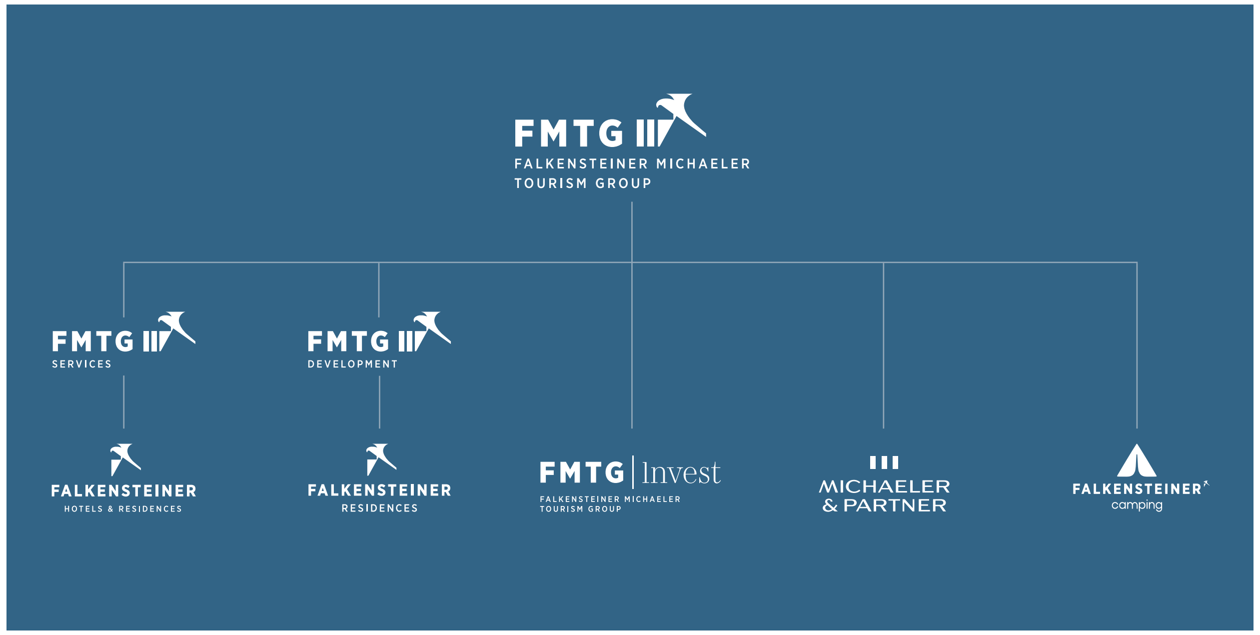


Fig. 5 – FMTG's country presence



The organisational units that shape FMTG’s business model are as follows:

FMTG SERVICES

FMTG Services comprises three hotel-management companies in Austria, Italy and Croatia that hold operating agreements with the hotels, apartment complexes and camping sites. It covers all operational activities of the hotels, Residences and, currently, also the camping resorts. Furthermore, it comprises all management and support functions for the group (e.g. accounting and controlling, brand strategy, marketing and sales, reservations, revenue management, quality management, IT, procurement, etc.) and runs hotel operations under the “Falkensteiner Hotels & Residences” brand or as a private label. A further task of Services is running hotel operations in its own name and on behalf of third parties by means of management or lease agreements. For this it levies a service and management fee that depends on the annual revenue development (7–12%).

FALKENSTEINER HOTELS & RESIDENCES

Falkensteiner Hotels & Residences runs hotel operations in its own name and on behalf of third parties. The focus is on the upscale 4-star and 5-star category. In 2025, Falkensteiner Hotels & Residences was represented in six countries: Austria, Italy, Croatia, the Czech Republic, Slovakia and Slovenia. Under the brand, 27 hotels, three apartment Residences and two camping sites are operated.

The Falkensteiner Hotel Belgrade was sold in April 2025.

FMTG DEVELOPMENT

FMTG’s development division looks for sites, develops projects, purchases real estate, seeks partners and investors and explores business opportunities. Its areas of activity comprise the evaluation and selection of development sites, client representation and planning optimisation, concept development for hotel and mixed-use projects, project marketing and financing as well as real-estate sales, including the sale of Branded Residences.

FALKENSTEINER RESIDENCES

With the Falkensteiner Residences, FMTG has created a holiday-property concept that combines innovative architecture, high-quality design, luxurious furnishings and investment security in prime locations, giving the motto "There's no place like home" a new dimension. Under the claim "Effortless Luxury Living", a comfortable, carefree lifestyle takes centre stage. Owners enjoy the comprehensive infrastructure as well as all the services of the adjacent Falkensteiner hotels. In addition, property management is taken over and FMTG provides a managed rental programme with flexible models that enables attractive returns.

FMTG Invest

Since 2017, FMTG has pursued the path of alternative corporate financing via crowd investment. In June 2022, the next step followed with the founding of FMTG Invest as a dedicated business division. Via its own digital investment platform www.fmtg-invest.com, simple, direct and digital investments in FMTG and its tourism projects are possible. FMTG Invest provides all relevant information first-hand and thereby strengthens the trusting connection between FMTG and its community of investors.

As a special feature, FMTG Invest offers the possibility of choosing between two interest-payment options – either cash or in the form of Falkensteiner vouchers. These vouchers can be redeemed for 30 years at any Falkensteiner tourism operation.

As of Q1 2026, more than 6,390 investors had invested a total of more than 11,500 times with FMTG Invest.

MICHAELER & PARTNER

The consulting company Michaeler & Partner offers internal and external consulting services for the construction, renovation, design and operation of tourism properties. This business unit of FMTG is divided into four business fields: project development, construction management, management consulting as well as Sustainability & ESG. These include the strategic consulting and support of investors, banks, real-estate companies, tourism destinations, etc. as well as comprehensive services in the development of tourism projects. More than 300 realised international projects in private hotels and in institutions confirm the company's extensive industry experience.

FALKENSTEINER camping

Falkensteiner Camping stands for a premium nature-camping concept that combines close-to-nature travel with a high level of comfort, high-quality infrastructure and smart service elements. The focus is on two central offering formats: high-quality Tiny Homes or Mobile Homes as a comfortable, design-oriented accommodation solution as well as premium pitches for motorhomes, caravans, campers and tents. In this way, Falkensteiner Camping creates an offering that addresses different travel needs while at the same time supporting a conscious use of space, promoting the experience of nature and enhancing the quality of stay. This concept is complemented by contemporary gastronomy, family-oriented offerings and digital services along the guest journey. With existing sites in Zadar and Grubhof as well as the opening of Falkensteiner Camping Wörthersee on 1 June 2026 and further projects in Pila, at Hafnersee and in Punat, Falkensteiner Camping is consistently developing its business division further along the lines of quality, closeness to nature and sustainable development. An essential part of this ambition is also the intended EU Ecolabel certification for all sites over the course of the following reporting periods. The Grubhof camping site is already certified; Zadar is in the certification process.

FMTG'S VALUE CHAIN

As a vertically integrated tourism group, FMTG covers the entire tourism value chain – from site development to guest services. The value creation process can be structured into the following phases:

Project development and investment phase

The upstream segment includes site identification, planning, concept development, and project management, managed by FMTG Development and Michaeler & Partner. Financing and marketing are supported by FMTG Invest through models such as crowd-investing. Sustainability aspects are embedded from the very beginning of the planning phase.

Hotel and Camping Operations

Operational delivery is managed primarily through Falkensteiner Hotels & Residences and Falkensteiner Premium Camping, with support from FMTG Services. Activities include procurement, guest check-in/out, administration, hotel services, facility management, HR, IT, and compliance. Sales are driven by multi-channel campaigns, partner programmes, and guest-focused initiatives for acquisition and retention. Dedicated service units ensure continuous guest engagement during and after their stay, including feedback management, loyalty programmes, and additional services.

Post-Stay Effects and Optimisation

Guest data and feedback are analysed to refine additional services and integrate returns such as reviews, upgrades, and recommendations into the ongoing improvement of service quality and value creation.

FMTG | Invest
FALKENSTEINER MICHAELER TOURISM GROUP

- Steering of the investments via the group's own crowd platform www.fmtg-invest.com
- Further development of alternative corporate financing for FMTG
- Interface for communication and reporting between the company & investors

FMTG DEVELOPMENT
FALKENSTEINER RESIDENCES

- Site selection & development
- Project management and planning optimisation
- Concept development
- Project marketing and financing
- Property sales

MICHAELER & PARTNER

- Project development
- Project management
- Hotel and tourism consulting
- ESG & sustainability consulting

FMTG SERVICES
FALKENSTEINER HOTELS & RESIDENCES
FALKENSTEINER camping

1. INBOUND LOGISTICS
- Purchasing
- Contract management
- Facility management

2. MARKETING & SALES
- Campaigns
- Partnerships
- Customer acquisition

3. SERVICE-ACTIVITIES
- Customer care during/after the stay
- Feedback & continuous improvement
- Loyalty programmes & customer retention

4. OPERATIONS
- Check-in & check-out-processes
- Management of the hotel infrastructure
- Hotel services

5. OUTBOUND LOGISTICS
- Management of guest data
- Additional services
- Optimisation

6. SUPPORT-ACTIVITIES
- Personnel management
- IT
- Compliance

Fig. 6 – FMTG value chain

9. STAKEHOLDERS

INTERESTS AND VIEWS OF STAKEHOLDERS

[ESRS 2 SBM-2]

CONSIDERATION AND TRACEABILITY OF STAKEHOLDERS' INTERESTS AND VIEWS IN THE STRATEGY AND BUSINESS MODEL

[ESRS 2 SBM-2.43 in conjunction with 2.45b]

The interests and perspectives of key stakeholders taken into account within the framework of the 2024 double materiality assessment continued to form the basis for FMTG's strategic orientation in the 2025 financial year.

The expectations gathered with regard to business activity, environmental impacts and social responsibility were systematically analysed in the previous year and integrated into the business model. These insights retained their validity in the 2025 financial year and were reviewed on an ongoing basis within the framework of existing management and feedback processes.

INVOLVEMENT OF KEY STAKEHOLDERS

[SBM-2.45a]

The material stakeholder groups identified in the previous year remained unchanged and were involved within the framework of the 2024 materiality assessment through workshops, interviews and target-group-specific dialogue formats. In the 2025 financial year, engagement continued to take place on an ad-hoc basis and via established exchange formats, but without a renewed structured full survey.

- Executive Board *(affected stakeholder & users of the sustainability statement)*
- Supervisory Board *(affected stakeholders & users of the sustainability statement)*
- Hotel owners / lessors *(affected stakeholders & users of the sustainability statement)*
- Banks *(users of the sustainability statement)*
- Hotel & Camping customers (i.e. guests) *(affected stakeholders)*
- Individual/crowd investors *(affected stakeholders)*
- Institutional investors /family offices *(affected stakeholders & users of the sustainability statement)*
- General Managers *(affected stakeholders & users of the sustainability statement)*
- Owners *(affected stakeholders & users of the sustainability statement)*
- Managing Directors *(affected stakeholders & users of the sustainability statement)*
- Corporate employees *(affected stakeholders & users of the sustainability statement)*
- Hotels & Camping employees *(affected stakeholders & users of the sustainability statement)*
- "Food" suppliers *(affected stakeholders)*
- "Development" suppliers *(affected stakeholders & users of the sustainability statement)*

INFORMATION ON THE PERSPECTIVES AND INTERESTS OF AFFECTED STAKEHOLDERS

[ESRS 2 SBM-2.45d]

The Executive Board and the Supervisory Board continue to be informed at least every six months about material developments relating to stakeholder interests. On an ad-hoc basis, this also takes place at shorter intervals, in particular at Executive Board level.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS 2 Appendix C in conjunction with SBM-2]

OWN WORKFORCE

[S1-SBM-2]

In the 2025 financial year, FMTG took into account the interests, views and rights of its workers in the design of its business model and strategy. The focus was in particular on human rights, fair working conditions as well as the involvement of employees, insofar as structurally envisaged.

To derive material fields of action, existing feedback mechanisms, employee surveys and external assessments were analysed.

AFFECTED COMMUNITIES

[S3-SBM-2]

The consideration of affected communities in the 2025 financial year took place predominantly indirectly within the framework of site-related decisions, taking into account regulatory requirements and external information sources.

The safeguarding of their rights, in particular with regard to the environment, social living conditions and health, formed a central premise for action.

CONSUMERS AND END-USERS

[S4-SBM-2]

The perspectives of consumers and end-users were taken into account in the 2025 financial year via existing feedback channels. The basis was formed by internal analyses, guest feedback as well as regulatory and industry-specific requirements.

In day-to-day operations, feedback from guest surveys, reviews or personal contact is documented regularly and, where necessary, integrated into the further development of offerings, processes or communication measures. Responsibility for processing and taking into account this feedback lies with the individual operations as well as the Quality & People Development staff unit. A systematic effectiveness review of these feedback processes has not yet been established.

The feedback collected was systematically recorded and integrated into the further development of offerings and processes.

10. FMTG'S MATERIAL SUSTAINABILITY TOPICS

DESCRIPTION OF THE PROCESS TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[ESRS 2 IRO-1]

METHODS AND ASSUMPTIONS IN THE CONTEXT OF THE MATERIALITY ASSESSMENT

[ESRS 2 IRO-1.53a]

The material sustainability aspects presented in this report, resulting from FMTG's material impacts, risks and opportunities ("IROs"), are based on a comprehensive materiality assessment carried out in the 2024 financial year in accordance with the principle of double materiality pursuant to CSRD/ESRS. In doing so, both the impacts of FMTG's business activity on people and the environment ("inside-out") and the financial risks and opportunities resulting from sustainability aspects ("outside-in") were taken into account.

A renewed full performance of the materiality assessment did not take place in the 2025 financial year, as no material changes with regard to the business model, activities or risk profile were identified. The material topics and IROs identified in 2024 therefore continued to form the basis for the reporting.

The analysis comprised all consolidated companies, units under operational control as well as the upstream and downstream value chain, and was guided by the requirements of the ESRS as well as, in addition, by the EFRAG Implementation Guidance "EFRAG IG 1 – Materiality Assessment".

Methodologically, the analysis was carried out in four steps:

1. **Context analysis & identification and evaluation of the most important stakeholders**
2. **Identification of potentially relevant topics & impacts, risks, and opportunities**
3. **Assessment and identification of material IROs in relation to sustainability aspects**
4. **Validation of the results of the materiality analysis, resulting in the most material sustainability aspects based on the material IROs**

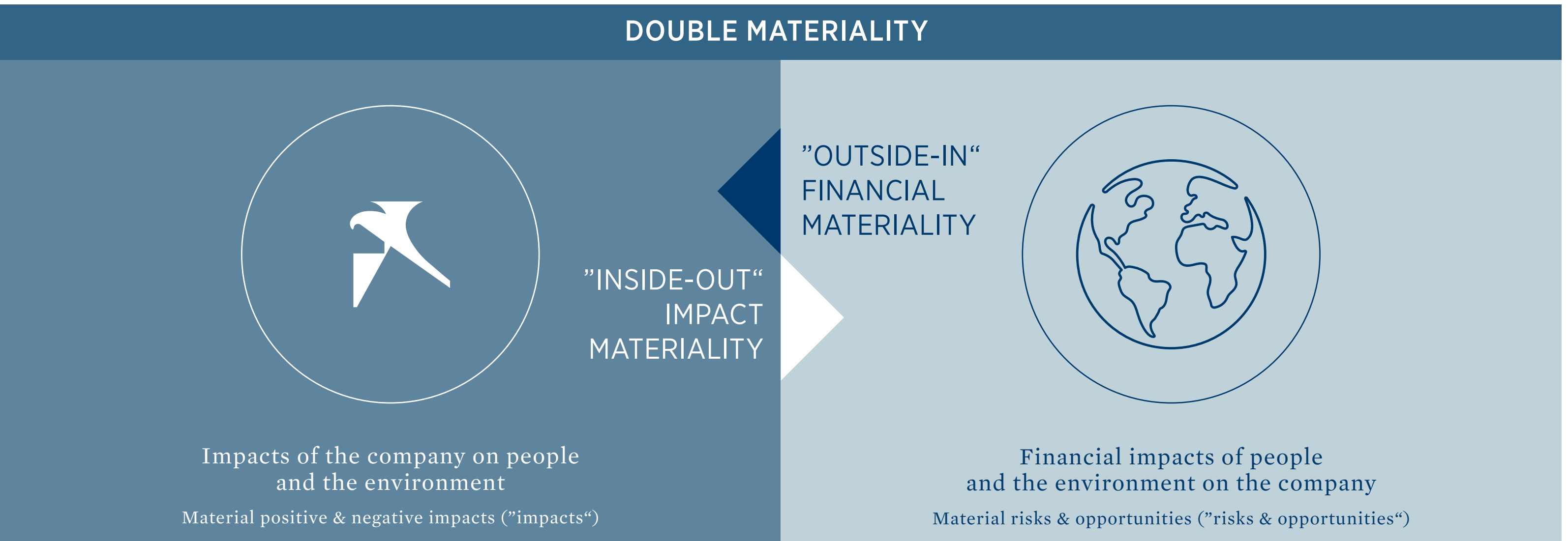


Fig. 7 – Double materiality

PROCESS FOR IDENTIFYING, ASSESSING, PRIORITISING, AND MONITORING POTENTIAL AND ACTUAL IMPACTS

The identification of material impacts took place within the framework of a structured stakeholder dialogue and initially led to a longlist of relevant impacts of FMTG on people and the environment. This was further validated and consolidated through internal workshops with the Management Board and managers as well as through the qualitative involvement of external stakeholders.

The impacts collected were systematically brought together and subsequently subjected to a materiality assessment in order to derive a prioritised shortlist of material impacts. Together with the financial risks and opportunities, this forms the basis for the reporting.

The assessment was carried out according to the ESRS on the basis of scale, scope and – in the case of potential impacts – likelihood of occurrence. In the case of negative impacts, irremediability was additionally taken into account; in the case of human-rights impacts, severity took precedence over likelihood of occurrence. The assessment was carried out taking into account short-, medium- and long-term time horizons.

PROCESS FOR IDENTIFYING, ASSESSING, PRIORITISING, AND MONITORING RISKS AND OPPORTUNITIES WITH FINANCIAL IMPACTS

[ESRS 2 IRO-1.53c]

The identification and assessment of material financial risks and opportunities took place in a structured process involving FMTG's central finance officers and taking into account the "outside-in" perspective. ESG-related impacts were systematically linked to potential financial effects in the process.

In particular, transition and physical climate risks, legal and financing risks as well as opportunities in the areas of market, innovation, efficiency, financing and reputation were taken into account. The identified matters were first recorded in a longlist and subsequently assessed and prioritised in order to derive a shortlist of material financial risks and opportunities.

The assessment was carried out on the basis of the potential financial impacts, the likelihood of occurrence as well as the time horizon. A threshold of 5% of consolidated EBIT was applied for financial materiality.

A structured decision-making process and a robust data foundation: on this basis, FMTG determines what is material to it – including topic-specific requirements.

DESCRIPTION OF THE DECISION-MAKING PROCESS AND ASSOCIATED INTERNAL CONTROL PROCEDURES

[ESRS 2 IRO-1.53d]

The decision-making process took place within the framework of the 2024 materiality assessment involving the Executive Board, the Executive Committee as well as further managers. Internal workshops served both the assessment and the validation of the results.

The final determination of the material impacts, risks and opportunities took place after a consolidating appraisal of the results in coordination with department heads, the Executive Board and the Management Board.

In the 2025 financial year, the identified material topics and IROs continued to be reviewed within the framework of existing governance, management and control processes and monitored for their continuing relevance.

INPUT PARAMETERS USED

DATA SOURCES, SCOPE OF THE OPERATIONS COVERED AND LEVEL OF DETAIL OF THE ASSUMPTIONS

[ESRS 2 IRO-1.53g]

For the materiality assessment, both company-internal data (e.g. from the areas of energy, procurement, HR, operations) and external sources were used. The latter comprised in particular reports of comparable tourism companies as well as studies and reports on tourism in connection with sustainability. The analysis took into account the entire value chain – in particular upstream processes such as energy and food procurement – as well as the assumptions on the emission calculation presented in detail in chapter E1. The level of detail was based on the availability of data – in the case of data gaps, traceable conservative assumptions were made or estimates were carried out.

TOPIC-SPECIFIC REQUIREMENTS

[ESRS 2 Appendix C in conjunction with IRO-1]

CLIMATE CHANGE

[E1-IRO-1]

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS

The impacts of FMTG on climate change, in particular in connection with greenhouse gas emissions, were classified as material.

For the systematic recording of emissions, a company-wide Corporate Carbon Footprint (CCF) was prepared in accordance with the Greenhouse Gas (GHG) Protocol (Scope 1, 2 and relevant Scope 3 categories). The results formed the basis for the assessment of climate-related impacts as well as for the derivation of corresponding management and mitigation measures.

Within the framework of this approach, both historical and projected emissions were analysed in order to assess their potential impacts on the environment, business activity and stakeholders and, building on this, to derive suitable measures.

The detailed presentation of greenhouse gas emissions in accordance with the GHG Protocol was again carried out in the 2025 financial year within the framework of disclosure requirement E1-6.

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED RISKS AND OPPORTUNITIES

Climate-related risks and opportunities were identified within the framework of the 2024 double materiality assessment using various methods and information sources.

For structured recording, industry-specific guidelines were consulted first. In addition, the identification of further risks and opportunities took place within the framework of workshops and dialogue formats with internal and external stakeholders. In addition, external data sources, in particular analyses and overview maps on climatic trends and changes of the European Environment Agency (EEA), were taken into account.

POLLUTION

[E2-IRO-1]

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS RELATED TO ENVIRONMENTAL POLLUTION

Within the framework of the materiality assessment, the sites of the hotels and camping sites as well as relevant parts of the value chain were analysed in order to systematically record actual and potential impacts on air, water and soil.

For validation, internal and external stakeholder perspectives were taken into account within the framework of consultations.

An involvement of affected communities did not yet take place during the reporting period and is envisaged for future updates of the materiality assessment.

WATER AND MARINE RESOURCES

[E3-IRO-1]

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS RELATED TO WATER AND MARINE RESOURCES

The identification of material impacts, risks and opportunities in connection with water availability, quality and use was based on a risk-oriented analysis. In doing so, own assets, operational activities as well as relevant parts of the upstream and downstream value chain were taken into account.

The assessment comprised in particular site-specific factors such as geographical, climatic, regulatory and ecological conditions as well as operational water-consumption data. In addition, external data sources, in particular indicators on water stress and hydrogeographic analyses, were consulted.

Building on this, water-related physical risks were analysed and reconciled with operational consumption and site data.

STAKEHOLDER INVOLVEMENT

The perspectives of key stakeholders were incorporated into the assessment. A more far-reaching involvement of local stakeholders and affected communities is envisaged for future updates.

Materiality needs more than one perspective – FMTG combines its own site analyses, data and stakeholder dialogue to identify relevant impacts, risks and opportunities.

BIODIVERSITY AND ECOSYSTEMS

[E4-IRO-1]

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS RELATED TO BIODIVERSITY AND ECOSYSTEMS

The assessment of material impacts on biodiversity and ecosystems was based on an analysis of own sites as well as relevant parts of the upstream and downstream value chain. In particular, land use, potential interventions in protected areas as well as impacts on habitats and species were taken into account.

Transition and physical risks, for example due to regulatory changes or the loss of ecosystem services, were analysed together with corresponding opportunities. The assessment was carried out taking into account site risks, regulatory exposure as well as ecosystem-related resilience.

To identify potential impacts on protected areas, external data sources, in particular map material of the European Environment Agency (EEA), were consulted. In doing so, it was examined whether sites are located in or near areas requiring protection (e.g. Natura 2000).

No negative impacts on protected areas were identified during the reporting period. Accordingly, no specific remedial measures were derived.

A more far-reaching analysis of dependencies on biodiversity and ecosystem services as well as a stronger involvement of affected communities are envisaged for future developments.

RESOURCE USE AND CIRCULAR ECONOMY

[E5-IRO-1]

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

The identification of material impacts, risks and opportunities in connection with resource use and circular economy was based on the analysis of own assets, business activities as well as relevant parts of the upstream and downstream value chain.

The focus was in particular on resource outflows, especially waste streams such as residual waste, hazardous and organic waste as well as non-recyclable materials and food waste.

STAKEHOLDER INVOLVEMENT

The perspectives of key stakeholders were incorporated into the assessment. A more far-reaching involvement of affected communities and additional external stakeholders, in particular in connection with local resource topics and waste management, is envisaged.

BUSINESS CONDUCT

[G1-IRO-1]

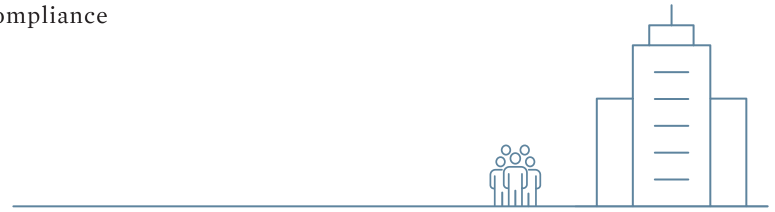
DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO BUSINESS CONDUCT

The identification and assessment of material impacts, risks and opportunities in the area of business conduct took place as an integral part of the 2024 materiality assessment with the aim of systematically identifying relevant governance topics and assessing them in the context of FMTG's business activity.

In particular, site-related regulatory conditions as well as governance risks, for example in the areas of corruption, transparency and human rights, were taken into account.

In addition, industry-specific challenges of the international tourism and leisure industry were incorporated, in particular in connection with seasonal staff, consumer protection, data protection as well as complex ownership and operator models. Transaction structures, for example in the case of developments, joint ventures and cross-border supply relationships, were also incorporated into the assessment.

The insights gained formed the basis for the assessment of materiality and fed into the further development of FMTG's governance and compliance structures.



DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S SUSTAINABILITY STATEMENT

[ESRS 2 IRO-2]

ESRS DISCLOSURE REQUIREMENT	TITLE OF THE DISCLOSURE REQUIREMENT	REFERENCE / LOCATION
ESRS 2 GENERAL DISCLOSURES		
BP-1	General basis for preparation of the sustainability statement	5. Basis for preparation (p. 22)
BP-2	Disclosures in relation to specific circumstances	5. Basis for preparation (pp. 22 f.)
GOV-1	The role of the administrative, management and supervisory bodies	6. Governance (pp. 24 ff.)
GOV-2	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	6. Governance (pp. 27 f.)
GOV-3	Integration of sustainability-related performance in incentive schemes	6. Governance (p. 28)
GOV-4	Statement on due diligence	7. Due diligence and risk management (p. 30)
GOV-5	Risk management and internal controls over sustainability reporting	7. Due diligence and risk management (p. 31)
SBM-1	Strategy, business model and value chain	8. FMTG's strategy and business model (pp. 32 ff.)
SBM-2	Interests and views of stakeholders	9. Stakeholders (pp. 40 f.)
SBM-3	Material impacts, risks and opportunities and their interaction with strategy and business model	10. FMTG's material sustainability topics (pp. 51 ff.); relevant topic-specific disclosures on SBM-3 in the sections on Environment (E1: pp. 65 ff.; E3: pp. 83 ff.; E4: p. 93; E5: pp. 101 ff.), Social (S1: pp. 113 ff.; S3: pp. 133 ff.; S4: pp. 141 ff.) & Governance (G1: pp. 151 ff.)
IRO-1	Description of the process to identify and assess material impacts, risks and opportunities	10. FMTG's material sustainability topics (pp. 42 ff.)
IRO-2	Disclosure requirements in ESRS covered by the undertaking's sustainability statement	10. FMTG's material sustainability topics (pp. 48 ff.)
MDR-P	Policies adopted to manage material sustainability matters	11. Minimum Disclosure Requirements MDR (p. 56)
MDR-A	Actions and resources in relation to material sustainability matters	
MDR-M	Metrics in relation to material sustainability matters	
MDR-T	Tracking effectiveness of policies and actions through targets	

ESRS DISCLOSURE REQUIREMENT	TITLE OF THE DISCLOSURE REQUIREMENT	REFERENCE / LOCATION
E1 CLIMATE CHANGE		
E1-1	Transition plan for climate change mitigation	p. 65
E1-2; E1-3; E1-4	Policies, actions and targets related to climate change mitigation and adaptation to climate change	pp. 70 ff.
E1-5	Energy consumption and mix	pp. 73 ff.
E1-6	Gross Scopes 1, 2, 3 and Total GHG emissions	pp. 75 ff.
E3 WATER AND MARINE RESOURCES		
E3-1; E3-2; E3-3	Policies, actions and targets related to water and marine resources	pp. 87 ff.
E3-4	Metrics related to water resources (water consumption & water intensity)	p. 91
E4 BIODIVERSITY AND ECOSYSTEMS		
E4-1	Transition plan and consideration of biodiversity and ecosystems in strategy and business model	p. 93
E4-2; E4-3; E4-4	Policies, actions and targets related to biodiversity and ecosystems	pp. 96 ff.
E4-5	Impact metrics related to biodiversity and ecosystems change	Not material (p. 99)
E5 RESOURCE USE AND CIRCULAR ECONOMY		
E5-1; E5-2; E5-3	Policies, actions and targets related to resource use and circular economy	pp. 104 ff.
E5-4	Resource inflows	Not material (p. 106)
E5-5	Resource outflows	pp. 107 f.
S1 OWN WORKFORCE		
S1-1	Policies related to own workforce	pp. 120 f.
S1-2	Processes for engaging with own workforce and workers' representatives about impacts	p. 122
S1-3	Processes to remediate negative impacts and channels for own workforce to raise concerns	pp. 122 f.
S1-4	Actions related to material impacts on own workforce	pp. 123 f.
S1-5	Targets related to own workforce	p. 124
S1-6	Characteristics of the undertaking's employees	p. 125
S1-7	Characteristics of non-employees in the undertaking's own workforce	Not material (p. 126)
S1-8	Collective bargaining coverage and social dialogue	p. 126
S1-9	Diversity metrics	p. 127
S1-10	Adequate wages	p. 127
S1-11	Social protection	p. 127
S1-12	Persons with disabilities	p. 128
S1-13	Training and skills development metrics	p. 128

ESRS DISCLOSURE REQUIREMENT	TITLE OF THE DISCLOSURE REQUIREMENT	REFERENCE / LOCATION
	S1 OWN WORKFORCE	
S1-14	Health and safety metrics	p. 129
S1-15	Work-life balance metrics	p. 129
S1-16	Remuneration metrics (pay gap and total remuneration)	p. 130
S1-17	Incidents, complaints and severe human rights impacts	p. 130
	S3 AFFECTED COMMUNITIES	
S3-1	Policies related to affected communities	p. 136
S3-2	Processes for engaging with affected communities about impacts	p. 136
S3-3	Processes to remediate negative impacts and channels for affected communities to raise concerns	p. 137
S3-4; S3-5	Actions and targets related to affected communities	pp. 137 ff.
	S4 CONSUMERS AND END-USERS	
S4-1	Policies related to consumers and end-users	p. 144
S4-2	Processes for engaging with consumers and end-users about impacts	p. 145
S4-3	Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	p. 145
S4-4; S4-5	Actions and targets related to consumers and end-users	pp. 146 f.
	G1 BUSINESS CONDUCT	
G1-1	Business conduct policies and corporate culture	pp. 154 ff.
G1-2	Management of relationships with suppliers	pp. 156 f.
G1-3	Prevention and detection of corruption and bribery	p. 157
G1-4	Incidents of corruption or bribery	p. 157
G1-5	Political influence and lobbying activities	p. 158
G1-6	Payment practices	p. 158

Fig. 8 – Disclosure requirements ESRS 2 IRO-2

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY & BUSINESS MODEL

[ESRS 2 SBM-3]

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[ESRS 2.48a in conjunction with 2.49]

FMTG makes use of the option to provide the more detailed descriptive information on its material impacts, risks, and opportunities directly within the respective topic-specific ESRS.

In line with ESRS 2, however, a statement on the material impacts, risks, and opportunities is presented here.

The presentation is based on the ESRS topics identified as material for FMTG. Each of these standards is associated with specific impacts, risks, and opportunities, resulting both from FMTG's own operations and along the upstream and downstream value chain. These topics were identified within a structured, multi-stage double materiality process and form the basis for the further explanations in this report.

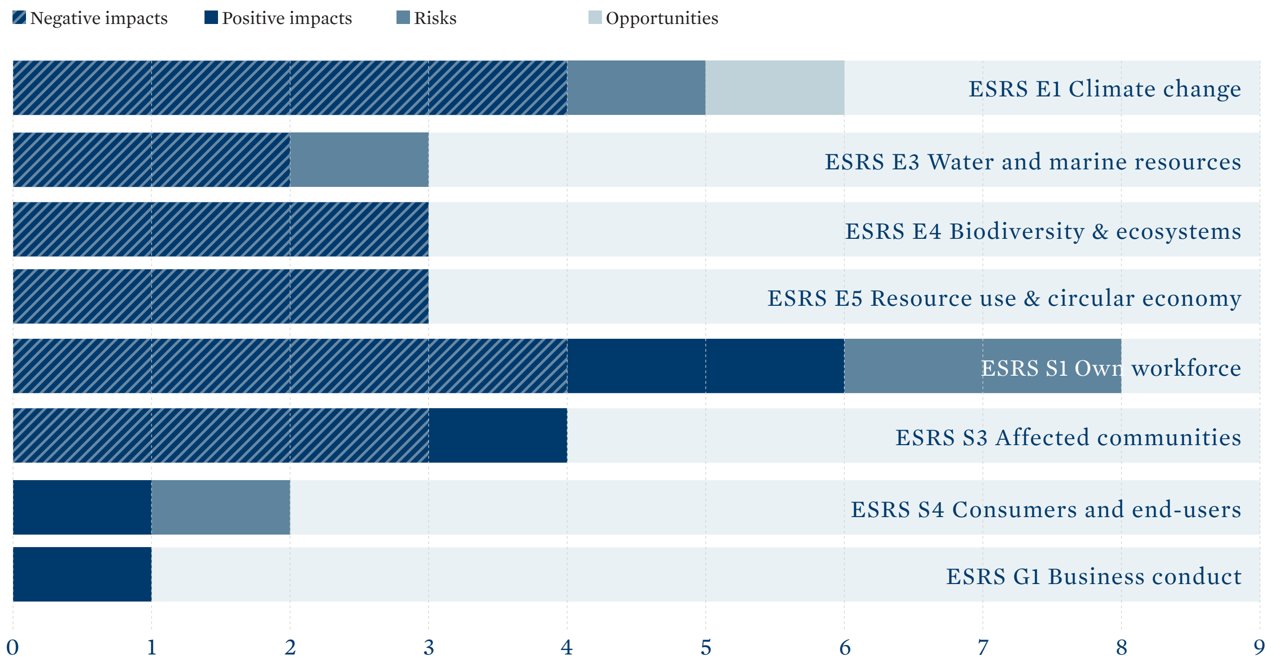


Fig. 9 – FMTG's material IROs

STATEMENT ON THE MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

SUSTAINABILITY ASPECT	ESRS	SUB-TOPIC	DESCRIPTION	IMPACT, RISK OR OPPORTUNITY
ENVIRONMENTAL ASPECTS				
Climate change	ESRS E1	Climate change mitigation & energy	High CO_2 emissions & energy consumption from operational hotel activities	Negative impact
		Climate change mitigation	Mobility emissions in operations	Negative impact
		Climate change mitigation	Causing high CO_2 emissions in the (upstream) value chain	Negative impact
		Climate change mitigation	High CO_2 emissions from guests' arrival and departure (guest mobility)	Negative impact
		Climate change adaptation	Restriction of business activity due to climatic changes and weather extremes	Risk
		Climate change mitigation	Qualification for investments and grants where ESG & sustainability are taken into account in the business model	Opportunity
Water and marine resources	ESRS E3	Water resources	High water withdrawal and extensive water consumption from operational hotel and camping activities	Negative impact
			Increased water consumption due to high food demand	Negative impact
			Restriction of business activity as a result of increasing water scarcity	Risk
Biodiversity and ecosystems	ESRS E4	Impacts on the extent and condition of ecosystems	Disruption of the natural processes of flora and fauna by hotel operations and guests	Negative impact
			Reduction of the habitats of flora & fauna through the sealing of land surfaces	Negative impact
		Direct impact drivers of biodiversity loss	Loss of biodiversity due to high food use and the associated resource-intensive production	Negative impact
Resource use and circular economy	ESRS E5	Resource inflows, including use	High resource consumption in the upstream value chain (above all due to construction activity)	Negative impact
			Increased resource consumption in upscale hotels and in the upstream value chain	Negative impact
		Waste	Causing large quantities of waste through operational hotel activities	Negative impact
SOCIAL ASPECTS				
Own workforce	ESRS S1	Working conditions	Partly restricted sense of comfort due to quality differences in staff accommodation	Negative impact
		Working conditions: Secure employment	Employment security due to the seasonal employment of employees	Negative impact
		Working conditions: Adequate wages	Dissatisfaction due to lower remuneration relative to other economic sectors	Negative impact
		Working conditions: Social dialogue	Dissatisfaction due to inadequate social dialogue	Negative impact
Own workforce	ESRS S1	Working conditions: Secure employment	Employment security due to stable employment relationships	Positive impact
		Company-specific aspect	Promotion of the recovery of employees	Positive impact
		Company- or industry-specific aspect	Shortage of (qualified) workers in tourism and hospitality	Risk
		Working conditions	Loss of attractiveness and departures due to poor working conditions	Risk
Affected communities	ESRS S3	Company-specific aspect	Decline in tourism acceptance in the affected community	Negative impact
		Economic, social and cultural rights of communities	Price increases for everyday goods due to the region becoming more attractive and high guest volumes	Negative impact
			Reduction of available land for local housing and infrastructure	Negative impact
			Increase in value creation for people and businesses in the region	Positive impact
Consumers and end-users	ESRS S4	Company-specific aspect	Contribution to the well-being and health-promoting experience of guests	Positive impact
		Information-related impacts for consumers and/or end-users	Risk of financial damage and reputational losses as a result of data-protection breaches	Risk
GOVERNANCE ASPECTS				
Business conduct	ESRS G1	Business conduct	Improved corporate culture	Positive impact

Fig. 10 – Statement on the material IROs

For FMTG, material impacts, risks and opportunities are not a reporting exercise – they are the basis for strategic decisions and operational actions.

A detailed presentation is therefore made in the following sections on environmental, social and governance information according to the relevant requirements of the topical standards, taking into account the supplementary topic requirements on SBM-3 pursuant to ESRS 2 Appendix C for selected standards:

- ESRS E1 Climate change (paragraphs 18 and 19)
- ESRS E4 Biodiversity and ecosystems (paragraph 16)
- ESRS S1 Own workforce (paragraphs 13 to 16)
- ESRS S3 Affected communities (paragraphs 8 to 11)
- ESRS S4 Consumers and end-users (paragraphs 9 to 12)

INFLUENCE OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES ON STRATEGY AND BUSINESS MODEL

[ESRS 2 SBM-3.48b]

As part of its materiality analysis, FMTG assessed the extent to which the identified material impacts, risks, and opportunities influence the existing business model, the company's value chain, as well as strategic orientation and decision-making processes. Both the current influence of existing matters and the potential expected influence over the short-, medium-, and long-term horizons were taken into account. The assessment was carried out in the context of operational processes, strategic projects, investment decisions, and the company's handling of external regulatory or market developments.

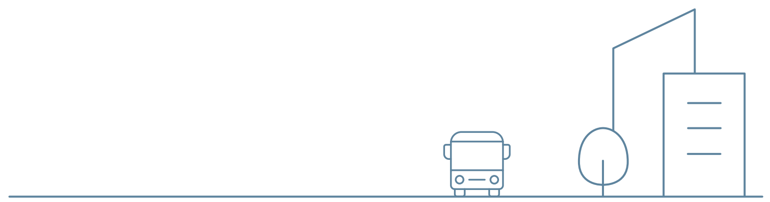
The company has examined or implemented measures for material IROs that may lead to adjustments in operations, product and service offerings, or site development. The specific type of response – such as technical measures, organisational changes, or strategic decisions – is described in the respective topic-specific sections.

RESILIENCE OF STRATEGY AND BUSINESS MODEL IN RELATION TO MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[ESRS 2 SBM-3.48 f.]

FMTG has qualitatively assessed the resilience of its strategy and business model with regard to the material impacts, risks, and opportunities identified within the double materiality analysis conducted in 2024. The analysis considers the company's ability to respond to relevant external changes, adapt to sustainability-related challenges, and effectively leverage opportunities.

The qualitative assessment was based on the time horizons provided in ESRS 1 Chapter 6 (short-, medium-, and long-term) and was carried out through consultation with internal decision-makers. A quantification of resilience was not conducted.



11. MINIMUM DISCLOSURE REQUIREMENTS (MDR)

VOLUNTARY CONSIDERATION

[ESRS 2.60 ff.]

ESRS 2 contains Minimum Disclosure Requirements (“MDR”) for reporting on policies (P), actions (A), metrics (M) and targets (T) related to material sustainability aspects. They are an integral part of the topic-related ESRS and ensure a transparent and traceable disclosure of material sustainability aspects.

For the 2025 reporting year, the MDR requirements were taken into account insofar as applicable – full implementation according to the detailed requirements of the currently valid ESRS versions is not claimed (see in this regard the following chapters on Environment, Social and Governance).

In this connection, reference should be made to the ongoing regulatory development: in December 2025, in the course of the “Omnibus I” package, EFRAG presented simplified ESRS drafts that envisage a renaming of the MDR to “General Disclosure Requirements” (GDR) as well as a reduction of the mandatory data points by around 61%. Formal adoption was still pending at the time of preparing the report. FMTG will incorporate the finalised requirements into future reporting periods.

2 ENVIRONMENTAL INFORMATION

Energy-efficient buildings, renewable energy, environmentally sound locations: The EU taxonomy helps FMTG to consistently align its investments with environmental criteria.

1. EU TAXONOMY REGULATION

THE EU TAXONOMY IN THE CONTEXT OF FMTG

The EU Taxonomy represents a central instrument for FMTG for increasingly aligning its financial flows – in particular turnover and capital expenditure (CapEx) – with a view to environmental sustainability. In doing so, FMTG makes a contribution to achieving the environmental objectives of the European Union. The EU Taxonomy Regulation as well as its delegated acts, in which the technical screening criteria are defined, form a uniform regulatory framework for classifying environmentally sustainable economic activities.

The EU Taxonomy is of particular importance for the tourism industry: as a sector that is highly dependent on intact ecosystems, biodiversity and a stable climate, tourism bears an inherent responsibility for protecting the natural foundations on which it is built. At the same time, the Taxonomy offers tourism companies such as FMTG a strategic frame of reference for systematically aligning investment decisions – for example with regard to energy-efficient buildings, renewable energies or nature-compatible site development – with environmental sustainability criteria.

The classification of economic activities as taxonomy-aligned also creates transparency towards financing partners and investors and facilitates access to sustainability-oriented financing instruments.

RELEVANT ECONOMIC ACTIVITIES OF FMTG AND CONNECTION TO TAXONOMY KPIS

The determination of the taxonomy-relevant shares of turnover and capital expenditure (CapEx) is carried out with respect to those economic activities of FMTG that fall under the following economic activities classified in the EU Taxonomy:

NAME OF THE ECONOMIC ACTIVITY	LINK TO KPI	
	TYPE OF METRIC	DESCRIPTION
Hotels, holiday, camping grounds and similar accommodation	Turnover	(External) revenue of the (fully consolidated) operational hotel operations of FMTG
	Capital expenditure (CapEx)	Additions to property, plant and equipment or also partially capitalised leases (e.g. hotel leases, larger machinery)
Acquisition and ownership of buildings	Turnover	Rental/lease income generated through the letting of an office property in Belgrade (IAS 40)
	Capital expenditure (CapEx)	Certain maintenance or repair expenses associated with the let property
Construction of new buildings	Capital expenditure (CapEx)	Development costs of newly built hotels in fixed assets or the development of new, additional buildings at existing hotels prior to the commencement of accommodation activities
Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	Capital expenditure (CapEx)	Construction of EV charging stations at parking spaces, garages, etc. at FMTG's individual hotel and camping sites
Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	Capital expenditure (CapEx)	Technical systems to increase efficiency in building operations, such as building automation and energy management systems, smart meters or facade/roof elements with a greening function
Installation, maintenance and repair of renewable energy technologies	Capital expenditure (CapEx)	Acquisition/installation of photovoltaic systems, solar panels or heat pumps
Transport by motorbikes, passenger cars and light commercial vehicles	Capital expenditure (CapEx)	Vehicles of the corporate fleet acquired through additions by purchase or lease

Fig. 11 – Economic activities EU Taxonomy

In its new-build projects, FMTG takes the taxonomy criteria as its guide – climate protection, adaptation and minimum social safeguards are incorporated from the very start of the planning process.

APPLICATION OF THE EU TAXONOMY CRITERIA IN NEW-BUILD PROJECTS

In the development and realisation of new-build projects, FMTG pursues a consistently taxonomy-oriented approach. The technical screening criteria of the EU Taxonomy Regulation are structurally taken into account as early as the planning and construction phase and form an integral part of the project-specific sustainability concept. These comprise in particular the criteria for a substantial contribution to climate change mitigation as well as to climate change adaptation, supplemented by the requirements of the DNSH principle ("Do No Significant Harm") and minimum social safeguards.

In order to ensure conformity with the Taxonomy criteria not only internally but also to make it transparent to stakeholders, financing partners and the market, FMTG has its new-build projects externally confirmed by recognised certification bodies. Concrete examples of this are the current new-build projects Falkensteiner Resort Lake Garda and the Falkensteiner Family Resort Licata, in which the taxonomy-aligned orientation was already anchored in the project development and corresponding certification is being sought or has already been obtained. FMTG sees in this structured approach not only a regulatory requirement but also strategic added value – both with regard to the future viability of its properties and with regard to access to sustainable financing instruments.

WAIVER OF THE PUBLICATION OF TAXONOMY METRICS PURSUANT TO ARTICLE 8 OF THE TAXONOMY REGULATION

In the 2025 reporting year, FMTG is not publishing any quantitative Taxonomy metrics pursuant to Article 8 of the Taxonomy Regulation (EU) 2020/852. This decision is based on several mutually reinforcing factors.

REGULATORY UNCERTAINTY DUE TO THE "OMNIBUS" INITIATIVE

In the course of the "Omnibus" initiative of the European Commission, both the technical screening criteria and the reporting obligations of the EU Taxonomy have been subjected to a fundamental revision. As these updated criteria have not yet been finally adopted at the time of preparing the report, a publication of metrics on the basis of the applicable but foreseeably revised legal framework would not ensure robust comparability and would be of limited informational value for stakeholders.

LACK OF PRACTICAL SUITABILITY OF THE TECHNICAL SCREENING CRITERIA FOR THE ACCOMMODATION SECTOR

The currently valid technical screening criteria for the economic activity "Hotels, holiday, camping grounds and similar accommodation" do not adequately reflect the operational and structural particularities of the sector and cannot realistically be met in practice.

A further complicating factor is that, for accommodation operations, a substantial contribution can currently be classified exclusively within the framework of the environmental objective "protection and restoration of biodiversity and ecosystems" – unlike, for example, in the real-estate sector, where the economic activities "construction of new buildings" and "acquisition and ownership of buildings" provide additional points of reference for the environmental objectives "climate change mitigation" and "climate change adaptation".

This limited scope for action structurally stands in the way of meaningful and informative Taxonomy reporting in the accommodation sector. FMTG therefore welcomes the fundamental revision of the technical screening criteria announced in the "Omnibus" process and expects this to result in a more sector-appropriate design that ensures realistic fulfilment and significantly improved practical suitability.

ELIMINATION OF THE REPORTING OBLIGATION DUE TO ADJUSTED SIZE THRESHOLDS

As a result of the size-dependent thresholds adjusted within the framework of the Omnibus 1 package, FMTG is formally no longer subject to any obligation to publish Taxonomy metrics pursuant to Article 8 of the Taxonomy Regulation. However, FMTG reserves the right to resume Taxonomy reporting – as already practised on a voluntary basis in the 2024 reporting year – as soon as the revised technical screening criteria have been finally adopted and a stable, practicable and application-oriented legal framework is in place. The outcome of the ongoing revision will be decisive for whether and to what extent voluntary reporting can be designed to be meaningful and informative in the future.

2. CLIMATE CHANGE

[ESRS E1]

INTRODUCTION

Progressing climate change is one of the most severe global challenges of our time and has a direct impact on the tourism industry – both through physical risks and through increasing expectations from regulators, guests, and investors. For FMTG, the responsible management of climate-related impacts and risks is a core element of corporate strategy. The aim is both to significantly reduce greenhouse gas emissions and to strengthen the resilience of locations to climatic changes. At the same time, opportunities should be leveraged to ensure that FMTG's business model remains sustainably attractive.

The focus is particularly on:

- the energy-intensive operational areas of hotels – such as heating, cooling, gastronomy, and wellness & spa services,
- climate-relevant aspects in the camping sector, such as energy consumption, infrastructure resilience, and mobility,
- as well as real estate developments, which are to be designed as sustainably as possible through energy-efficient planning, sustainable building materials, and the use of renewable energies.

CONNECTION TO OUR CORPORATE VALUES

FMTG's actions in the area of climate change adaptation are guided by its core values:

- **Driven for success:** We pursue ambitious targets to reduce our CO_2 footprint along our entire value chain – from hotel and camping operations to project development.
- **Grounded:** We promote respectful use of resources and rely on practical, environmentally friendly solutions in day-to-day operations.
- **Courageous:** We proactively invest in innovative technologies and future-oriented concepts for climate-friendly hospitality and infrastructure.
- **Relationship-oriented:** We actively involve our guests, employees, and business partners in our climate protection measures and rely on shared responsibility.

MATERIALITY OF THE TOPIC

The topic of climate change was classified as material within the framework of the double materiality assessment – both with regard to the impacts of FMTG's business activities on the climate and with respect to climate-related risks and opportunities. This chapter discloses the information required under ESRS E1 in conjunction with ESRS 2. This includes information on governance, strategy, as well as material climate-related impacts, risks, and opportunities. In addition, this chapter contains information on the underlying procedures, specific targets, measures, and key performance indicators (KPIs) concerning greenhouse gas emissions, as well as adaptation to climate change in the context of FMTG's hotel, camping, and development activities.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS E1 in conjunction with ESRS 2]

GOVERNANCE

INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

[E1-GOV-3]

Reference may be made at this point to the relevant disclosures on E1-GOV-3 in the section *General information – 6. Governance*.

STRATEGY

TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

[E1-1]

In the reporting period in question, FMTG does not yet have a formal transition plan for climate change mitigation or for limiting global warming to 1.5 °C. The aim is to develop such a plan for the first time in the 2026 reporting year, based on science-based targets (e.g. Science Based Targets initiative, SBTi). The plan is intended to be the basis for reconciling FMTG's strategy and business model with the transition to a sustainable economy and with the targeted limitation of global warming to 1.5 °C in accordance with the Paris Agreement as well as the EU's goal of achieving climate neutrality by 2050.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[E1-SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS E1-SBM-3 on the material climate-related impacts, risks, and opportunities as well as their interaction with strategy and business model.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS E1, including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS E1 (cf. ESRS 2 paragraph 49).

MATERIAL CLIMATE-RELATED IMPACTS

ESRS E1 – CLIMATE CHANGE: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
High CO_2 emissions & energy consumption from operational hotel activities	The operation of the hotel and camping facilities requires the use of non-renewable energy sources for heating, cooling as well as energy-intensive areas such as wellness, pools, kitchens and sanitary facilities. The resulting greenhouse gas emissions contribute directly to climate change.	Climate change mitigation & energy	Actual negative impact	FMTG's business model is based on the operation of high-quality hotel and camping facilities with comfort-intensive offerings (pool, spa, gastronomy). The reduction of energy-related emissions is a central lever of the group-wide ESG strategy – through measures for energy efficiency, electrification of the heat supply and gradual conversion to renewable energies.	Own business activity	**Short term:** Immediate CO_2 emissions through the use of fossil energy sources. **Medium term:** Increasing atmospheric burden through continuous greenhouse gas emissions. **Long term:** Systemic climate changes with global consequences (e.g. temperature rise, increased weather extremes).	Direct responsibility for the emissions caused at the company's own sites
Mobility emissions in operations	In ongoing operations, mobility-related emissions arise from business travel, internal transport routes and logistics journeys. In rural regions with limited public transport connections, vehicles with combustion engines are predominantly used for this purpose.	Climate change mitigation	Actual negative impact	The mobility of employees is strongly anchored in FMTG's business model.	Own business activity	see above	Direct for company-owned mobility activities using the company's own vehicles (Scope 1) and indirect for necessary business travel, e.g. by rental car or aircraft (Scope 3)
Causing high CO_2 emissions in the (upstream) value chain	Material Scope 3 emissions arise from emission-intensive upstream inputs in construction and procurement (including concrete, steel, insulation materials, textiles) as well as from food from conventional agriculture with a high CO_2 footprint.	Climate change mitigation	Actual negative impact	The operation and further development of high-quality tourism infrastructure entail a high demand for material- and emission-intensive upstream inputs from construction and product supply chains.	Upstream business activity – in both construction- and product-related supply chains	**Short and medium term:** Emissions from ongoing and planned projects as well as standardised procurement processes. **Long term:** Cumulative climate contribution, in particular through long-lived construction products (cf. above).	Indirect – can be influenced through the selection and management of construction and supply partners as well as the product portfolio
High CO_2 emissions from guests' arrival and departure (guest mobility)	The arrival and departure of guests at hotel and camping sites – predominantly by private motorised transport or aircraft – causes considerable CO_2 emissions in the downstream value chain.	Climate change mitigation	Actual negative impact	Guests predominantly arrive by private motorised transport. FMTG actively promotes environmentally friendly alternatives such as arrival by rail and e-mobility.	Downstream business activity	**Short and medium term:** Emissions arise immediately; behavioural changes require time as well as the establishment and expansion of infrastructure and cooperation models. **Long term:** Cumulative contribution to climate change (see above).	Indirect – can be influenced via framework conditions, information and offerings on alternative, more environmentally friendly arrival options

Fig. 12 – Material impacts ESRS E1

MATERIAL CLIMATE-RELATED RISKS AND OPPORTUNITIES

ESRS E1 – CLIMATE CHANGE: MATERIAL RISKS AND OPPORTUNITIES									
NAME OF THE RISK OR OPPORTUNITY	DESCRIPTION OF THE RISK OR OPPORTUNITY	SUB-TOPIC	TYPE OF RISK OR OPPORTUNITY	LOCATION IN THE BUSINESS MODEL AND IN THE VALUE CHAIN			INFLUENCE ON STRATEGY, BUSINESS MODEL AND DECISION-MAKING	RESILIENCE OF STRATEGY AND BUSINESS MODEL FOR MANAGING MATERIAL RISKS OR MAKING USE OF MATERIAL OPPORTUNITIES	CURRENT FINANCIAL EFFECTS ON FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS
				OPERATIONAL RELEVANCE	POSITION IN THE VALUE CHAIN	GEOGRAPHICAL CONCENTRATION			
Restriction of business activity due to climatic changes and weather extremes	The progressive climate change increases the risk of climate-related extreme weather events at several FMTG sites (heavy rain, floods, storms, heatwaves, landslides). Possible consequences are infrastructure damage, business interruptions and restrictions in the guest experience as well as short- to long-term financial burdens.	Adaptation to climate change	Climate-related physical risk	Affected are hotel and camping sites with exposed infrastructure (e.g. outdoor areas, pools, access roads) as well as supply and logistics systems.	The risk affects both the company's own business activity and the upstream value chain in the form of external service providers or suppliers of FMTG (transport, energy supply, staff availability) in the affected regions.	Italy: Southern Italy (heat, drought), South Tyrol (heavy rain, mudslides, avalanche risk); Croatia: coastal regions with flood risk and storm events; Austria: Alpine regions with increased susceptibility to heavy rain, mudflows, landslides	**Strategic:** Consideration of climate-related site criteria (topography, drainage, protective infrastructure) in project decisions. **Planned:** Expansion of resilient infrastructure (flood protection, heat protection, water treatment), increased standards for new construction and refurbishment as well as site diversification.	**Current status:** Resilience varies by site – minimum standards in place in isolated cases, in part there are adaptation gaps. **Measures:** Expansion of technical standards, adjustment of risk management, ongoing exposure review. **Outlook:** Climate vulnerability assessments and scenario analyses planned; integration of physical climate risks into portfolio steering.	• Single-event-related costs due to maintenance, disruptions to the operational process • Investments & expenditure for preventive measures such as de-sealing, reinforcements, etc.
Subsidies where ESG & sustainability are taken into account in the business model	National, regional and EU-wide funding programmes offer financial incentives for investments in climate-friendly technologies, construction projects and operational equipment – for example energy efficiency (thermal refurbishment), renewable energies (photovoltaics), e-mobility infrastructure and fossil-free heating and cooling systems.	Climate change mitigation	Climate-related transition opportunity	Affects both new construction and the refurbishment of existing hotel and camping sites, investments in building technology, energy generation and mobility offerings.	Relevance in the company's own business activity (buildings, vehicle fleet, energy supply) as well as in upstream planning and investment decisions.	Particularly relevant in EU countries with strongly developed funding systems, in particular Austria, Italy (incl. South Tyrol) and Croatia as well as within the framework of EU-financed programmes (e.g. Green Deal, ERDF, Recovery and Resilience Facility).	**Short term:** Systematic collection and use of available funding for ongoing construction and refurbishment projects. **Strategic:** Anchoring of funding management and climate protection investments in the corporate strategy and project steering. **Planned:** Expansion of climate-friendly technologies at all sites, prioritisation of eligible investments.	**Current status:** The use of funding is already anchored in the corporate strategy. **Measures:** Building up internal competence for funding research and application; integration into investment processes. **Outlook**: Further institutionalised use of EU programmes and sectoral funding calls planned.	• Use of existing funding programmes (e.g. photovoltaic subsidies, investment premiums, refurbishment packages) for the co-financing of ongoing projects • Reduction of investment costs through grants, tax relief and low-interest financing

Fig. 13 – Material risks and opportunities ESRS E1

RESILIENCE OF STRATEGY AND BUSINESS MODEL IN RELATION TO CLIMATE CHANGE

FMTG's material physical and transition climate risks were systematically identified for the first time in the course of the 2024 financial year and have since formed the basis for the further development of a climate-resilient corporate and site strategy.

To assess physical climate hazards, FMTG uses a data-based online tool from Munich RE. In doing so, two IPCC scenarios (RCP 2.6 and RCP 4.5) were used – whereby data for all four IPCC/RCP scenarios is available. The climate hazards were assessed for all sites across five time horizons (current year, 2030, 2040, 2050 and 2100), with the focus of the analysis being on risk identification and the prioritisation of the following four risk categories:

- Temperature-related risks (heatwaves, frost, etc.)
- Wind-related risks (storms, tornadoes)
- Water-related risks (floods, drought, water stress, etc.)
- Solid-mass-related risks (avalanches, soil erosion, etc.)

In the coming years, the analysis will be continued to determine, in the next step, the exposure and sensitivity with regard to the hazards identified in the first step, in order to derive the actual vulnerability from this.

The results feed directly into site-specific resilience measures as well as into the group's investment and sustainability decisions.

Transition risks relating to climate change were identified on the basis of stakeholder surveys and a financial assessment by the finance department, and were supplemented by observing regulatory developments, changing market requirements and the shift in consumer behaviour, and integrated into strategic planning.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[E1-IRO-1]

Reference may be made at this point to the disclosures on ESRS 2 IRO-1 in conjunction with E1-IRO-1 in the section General information – 10. FMTG's material sustainability topics.

POLICIES, ACTIONS AND TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION TO CLIMATE CHANGE

[E1-2; E1-3; E1-4]

TARGETS

In the 2025 reporting year, within the framework of its ESG strategy, FMTG further specified the group's climate change mitigation and energy targets and, for the first time, brought them together in a structured system of targets with defined time horizons. The following overview provides an overview of the material targets that apply to hotel and camping operations as well as to the corporate level.

CLIMATE CHANGE MITIGATION AND ENERGY				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Holistic Corporate Carbon Footprint (Scope 1, 2 & 3) of FMTG from FY 2024	2024	✓	✓	✓
Preparation of a transition plan with a reduction of Scope 1, 2 and 3 emissions (base year FY 2025; targets for 2030, 2040, 2050)	2026	✓	✓	✓
Ensuring a fully digitalised consumption-data recording of all hotel and camping operations	2027	✓	✓	
Increasing the share of renewable energy to at least 70% of total energy consumption (electricity, heat, cooling)	2030	✓	✓	
Ensuring on-site renewable energy production at 70% of FMTG sites (where green electricity is not available)	2030	✓	✓	
Phase-out of fossil fuels for heat supply (oil, gas, etc.)	2035	✓	✓	
Repair & optimisation of the building management system (consumption-data recording) in all hotel operations	2028	✓	✓	
Increasing the share of organic products as well as regional products (food) to the standard of the Austrian Ecolabel in all hotel & camping operations (where available and economically viable)	2028	✓	✓	
50% of vehicles with alternative drives (hybrid & electric) for the group-wide vehicle fleet	2030	✓	✓	✓

Fig. 14 – Targets ESRS E1

As the most important basis for the further development of the decarbonisation process, the group-wide recording of the Corporate Carbon Footprint (CCF) across all Scope 1, Scope 2 and Scope 3 emissions was established for the first time in the 2024 financial year. Building on the results of the 2025 reporting year as the base year, the preparation of a formal transition plan is envisaged for the 2026 financial year, which will define concrete emission reduction targets for 2030, 2040 and 2050.

In the area of energy supply, FMTG pursues the goal of increasing the share of renewable energy to at least 70% of total energy consumption by 2030 and of ensuring its own renewable energy production at 70% of the sites. In addition, the complete phase-out of fossil fuels for heat supply is planned by 2035. The repair of the building management technology by 2028 as well as the seamless digitalised consumption-data recording of all operations by 2027 create the operational basis for this.

In addition, FMTG addresses emission-relevant levers in procurement and mobility: the share of organic and regional products is to be raised to the standard of the Austrian Ecolabel by 2028, and for the fleet a share of at least 50% of vehicles with an alternative drive is targeted by 2030.

ACTIONS

The consistent implementation and continuous further development of its actions are central success factors for achieving the objectives of FMTG's ESG strategy. In the 2025 reporting year, the strategic targets were further sharpened and specified – the substantive priorities deliberately remained constant, which enabled a targeted further development of the existing set of measures without fundamentally changing the course taken. Within the framework of this approach, the following measures, among others, were implemented or continued in 2025 in order to drive forward the continuous reduction of the group's CO_2 emissions:

Continuous further development of the Corporate Carbon Footprint (CCF) as a management instrument

A central goal in the 2025 reporting year was the continuous improvement of the data quality of the Corporate Carbon Footprint. Through a gradual optimisation of data collection and validation across all hotel operations, camping operations and office locations, the informative value of the CCF was significantly increased. In this way, the CCF is increasingly developing from a pure reporting instrument towards an active management instrument – and forms the basis for targeted and accurate reduction measures within FMTG.

Certification with the Austrian Ecolabel and the EU Ecolabel

As part of FMTG's ESG strategy, the certification of the entire hotel portfolio with the Austrian Ecolabel as well as the EU Ecolabel was driven forward in the reporting year. Both certifications set defined requirements, among other things in the areas of energy efficiency, resource conservation and waste management, and thus make a structured contribution to the continuous improvement of environmental performance at operational level. The targeted comprehensive certification of the entire portfolio reflects FMTG's ambition to anchor sustainability not as an individual measure but as an integral part of the entire hotel operation.

Renewable energy

The operation of hotel and camping facilities requires considerable amounts of energy. In order to reduce the resulting CO_2 emissions, FMTG relies on the use of renewable energies. In the 2025 reporting year as well, the entire Austrian portfolio was supplied with purchased green electricity, which makes a significant contribution to reducing the group's Scope 2 emissions.

In addition, FMTG is driving forward the expansion of its own renewable energy generation. In 2025, two further photovoltaic systems were put into operation – at the Falkensteiner Hotel Kronplatz in Italy as well as at the newly joined Grubhof camping site. In total, the group produced around 458 MWh of electricity from its own PV systems in 2025. Heat and cooling supply has already been converted to local and district heating or heat pumps at numerous sites. The decarbonisation of the portfolio is understood as an ongoing process in which technical feasibility and economic viability are continuously evaluated.

Avoidance of single-use plastic bottles for hotel guests

In the 2025 reporting year, FMTG converted the drinking-water bottles provided to guests as standard on departure from single-use plastic bottles to carton-based composite packaging from the supplier Aqualy. According to the manufacturer, these consist of more than 70% plant-based, FSC-certified materials; the share of fossil-based plastic per packaging is thus below that of the single-use bottles used to date. The measure addresses the group-wide targets of reducing single-use products in operations and gradually expanding the share of certified consumer materials on the customer side.

POLICIES

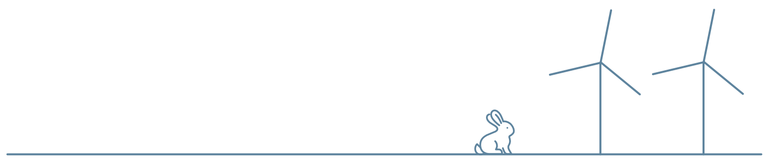
For the 2026 financial year, it is planned to bring together all targets and measures relating to climate change mitigation and adaptation to climate change in an "Environmental Policy" and to formally anchor them, in order to create a binding management framework that links ecological ambition with measurable target values and clear responsibilities.

METRICS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION TO CLIMATE CHANGE

ENERGY CONSUMPTION AND MIX

[E1-5]

Energy is one of the central emission drivers in hotel and camping operations. The following metrics present FMTG's total energy consumption and energy mix in the 2025 reporting year and show the progress towards an increasingly renewable energy supply.



E1-5.37 TOTAL ENERGY CONSUMPTION					
ENERGY CONSUMPTION AND ENERGY MIX	HOTELS & CAMPING	ASSETS, DEVELOPMENT & OTHER PROPERTIES	FMTG OFFICES	TOTAL 2025	TOTAL 2024
Total fossil energy consumption (MWh)	37,833	-	257	38,090	42,810
Share of fossil sources in total energy consumption (%)	45.3%	0.0%	68.2%	45.4%	50.5%
Consumption from nuclear power sources (MWh)	-	-	-	-	-
Share of consumption from nuclear sources in total energy consumption (%)	-	-	-	-	-
Fuel consumption for renewable sources, including biomass (MWh)	-	-	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from renewable sources (MWh)	45,246	48	120	45,414	41,657
Consumption of self-generated non-fuel renewable energy (MWh)	458	-	-	458	346
Total renewable energy consumption (MWh)	45,704	48	120	45,872	42,003
Share of renewable sources in total energy consumption (%)	54.7%	100.0%	31.8%	54.6%	49.5%
Total energy consumption (MWh)	83,537	48	377	83,962	84,813

Fig. 15.1 – Total energy consumption

E1-5.38 ENERGY CONSUMPTION FROM FOSSIL SOURCES					
ENERGY CONSUMPTION AND ENERGY MIX	HOTELS & CAMPING	ASSETS, DEVELOPMENT & OTHER PROPERTIES	FMTG OFFICES	TOTAL 2025	TOTAL 2024
Fuel consumption from coal and coal products (MWh)	-	-	-	-	-
Fuel consumption from crude oil and petroleum products (MWh)	379	-	-	379	244
Fuel consumption from natural gas (MWh)	12,730	-	-	12,730	12,306
Fuel consumption from other fossil sources (MWh)	-	-	-	-	-
Consumption of purchased or acquired electricity, heat, steam and cooling from fossil sources (MWh)	24,723	-	257	24,980	30,260

Fig. 15.2 – Total energy consumption from fossil sources

E1-5 ENERGY INTENSITIES		
ENERGY INTENSITY PER M² & BEDNIGHT	2025	2024
Energy intensity per m² (MWh/m²)	0.20	0.20
Energy intensity per bednight (MWh/BN)	0.04	0.04

Fig. 15.3 – Energy intensities

FMTG's absolute total energy consumption declined slightly in 2025, whereby this is largely attributable to the elimination of the let office building and the hotel operation in Serbia. The share of renewable energy rose further, after the Grubhof camping site (100% hydropower, own PV system) as well as the Hotel Bozen Waltherpark – also supplied predominantly with renewable electricity in 2025 – were newly added in Austria.

The energy intensity per square metre remained almost the same, after disposals took place in the portfolio in Serbia but additions also occurred in Austria and Italy. The energy intensity per bednight likewise remained almost constant, after energy consumption in hotel operations and overnight stays developed in a linear fashion.

GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

[E1-6]

FMTG'S GREENHOUSE GAS ACCOUNTING IN ACCORDANCE WITH THE GREENHOUSE GAS PROTOCOL

Since the 2024 financial year, FMTG has prepared a group-wide Corporate Carbon Footprint (CCF) annually in accordance with the guidelines of the Greenhouse Gas (GHG) Protocol and continues this accounting in the 2025 reporting year. The ESG software Code Gaia is used as the calculation tool, which draws on recognised international emission databases – including, among others, IRENA, Ecoinvent, IEA, EEA, DEFRA, EPA as well as the GHG Protocol itself.

The CCF comprises all Scope 1 emissions (direct emissions from own sources), Scope 2 emissions (indirect emissions from purchased energy) as well as nine Scope 3 categories assessed as material along the upstream and downstream value chain.

APPROACH AND METHODOLOGY

Scope 1 and Scope 2 data are primarily collected via the group-wide consumption-data monitoring (EUDT) as well as via suppliers' invoices. The Scope 3 categories were subjected in the previous year to a structured materiality assessment – assessed according to greenhouse gas relevance, influenceability and strategic importance – and comprise the following nine categories: purchased goods and services (3.1), capital goods (3.2), fuel- and energy-related emissions (3.3), upstream transport (3.4), waste (3.5), business travel (3.6), employee commuting (3.7), downstream leasing (3.13) as well as investments (3.15).

The collection was carried out in a standardised manner group-wide and forms the basis for the development of concrete reduction targets within the framework of the transition plan planned for 2026.

The results of the greenhouse gas accounting for the 2025 reporting year are presented in the following tables.

OVERVIEW OF EMISSIONS BY SCOPE (tCO_2e)	AUSTRIA (AT)	ITALY (IT)	CROATIA (HR)	SLOVAKIA (SK)	CZECH REPUBLIC (CZ)	SLOVENIA (SI)	2025 FMTG TOTAL	2024 FMTG TOTAL
	tCO_2e							
Scope 1 GHG emissions	**912**	**657**	**1,484**	**196**	**294**	**-**	**3,544**	**2,762**
Gross Scope 1 GHG emissions	912	657	1,484	196	294	-	3,544	2,762
Biogenic emissions in Scope 1	8	5	3	-	1	-	17	25
Scope 2 GHG emissions	**715**	**2,869**	**2,418**	**383**	**1,872**	**30**	**8,288**	**11,331**
Gross location-based Scope 2 GHG emissions	3,785	2,540	4,303	180	2,671	17	13,496	15,574
Gross market-based Scope 2 GHG emissions	715	2,869	2,418	383	1,872	30	8,288	11,331
Total indirect gross Scope 3 GHG emissions	**11,023**	**33,963**	**8,250**	**547**	**2,116**	**4**	**55,903**	**34,691**
Scope 3.1 – Purchased goods & services	7,761	4,613	5,414	348	1,251	-	19,388	19,355
Scope 3.2 – Capital goods	128	-	-	-	-	-	128	94
Scope 3.3 – Fuel- and energy-related activities	1,785	832	1,181	79	477	4	4,358	5,686
Scope 3.4 – Upstream transport and distribution	1,231	717	793	55	225	-	3,021	4,764
Scope 3.5 – Waste from own operations	30	69	816	62	151	1	1,129	136
Scope 3.6 – Business travel	84	31	45	3	12	-	174	167
Scope 3.7 – Employee commuting & home office	5	-	-	-	-	-	5	5
Scope 3.13 – Leased assets	-	-	-	-	-	-	-	1,083
Scope 3.15 – Investments	-	27,700	-	-	-	-	27,700	3,403
Total GHG emissions (location-based)	**15,720**	**37,160**	**14,037**	**923**	**5,081**	**22**	**72,943**	**53,027**
Total GHG emissions (market-based)	**12,651**	**37,489**	**12,152**	**1,126**	**4,282**	**35**	**67,734**	**48,783**

Fig. 16 – Scope 1-3 overview

E1-6.53 GHG EMISSION INTENSITIES		
GHG INTENSITY PER NET REVENUE (TCO_2E/EUR ’000)	2025	2024
Total GHG emissions (location-based) per net revenue	0.28	0.22
Total GHG emissions (market-based) per net revenue	0.26	0.20
GHG INTENSITY PER M^2	2025	2024
Total GHG intensity (location-based) per m^2	0.18	0.13
Total GHG intensity (market-based) per m^2	0.16	0.12
GHG INTENSITY PER BEDNIGHT (TCO_2E/BN)	2025	2024
Total GHG intensity (location-based) per bednight	0.04	0.03
GHG intensity (market-based) per bednight	0.03	0.03

Fig. 17 – GHG emission intensities

Transparent metrics reveal where FMTG’s greatest potential for decarbonisation and the responsible use of resources lies – while also serving as the benchmark for whether we are on the right track and our measures are achieving the intended impact.

Scope 1 emissions

FMTG's direct greenhouse gas emissions – the so-called Scope 1 emissions – comprise essentially three sources in the 2025 reporting year: the fuel consumption of the group-wide fleet, the use of fossil fuels for heat generation, above all natural gas, as well as the operationally required refill quantities of refrigerants in the hotel and camping operations. Compared with the previous year, these direct emissions rose by around 28%. This development is attributable to the interplay of several factors: the significantly increased number of guest overnight stays raised the operational energy demand of the operations, a cold winter led to an increased heating demand at the sites, and the intensified travel activity of employees was reflected accordingly in the fuel consumption of the fleet. The group monitors this development attentively and sees the further phase-out of fossil energy sources as well as the electrification of the fleet as key levers for the long-term reduction of direct emissions.

Scope 2 emissions

FMTG's market-based Scope 2 emissions – i.e. the indirect emissions from purchased energy – fell by around 27% in the 2025 reporting year compared with the previous year. This gratifying decrease is the result of several mutually reinforcing developments. The decisive factor was above all the consistent use of supplier-specific CO_2 emission factors for purchased electricity and district heating: instead of resorting to flat-rate and typically significantly higher residual-mix factors, the actual emission intensities of the respective energy suppliers now feed into the calculation – a significant leap in quality in emissions reporting. In addition, the continuous improvement of consumption-data recording has increased the accuracy of the underlying consumption volumes. Furthermore, since the reporting year, the emissions of the Falkensteiner hotel in Serbia, which no longer belongs to the group's portfolio, have ceased to apply. Last but not least, the ongoing efficiency measures in the hotel and camping operations – from the optimisation of the building management system through to the use of renewable energy sources – contribute continuously to reducing energy-related emissions.

Scope 3 emissions

FMTG's total Scope 3 emissions rose by around 61% in the 2025 reporting year compared with the previous year. However, this at first glance striking increase is essentially attributable to a one-off, project-related effect and does not reflect a structural deterioration of the operational emissions balance. The main driver of the increase is category 3.15 – Investments, in which the emission-relevant construction projects of the group are recorded: two hotel projects in Italy recorded significant construction and development progress in the 2025 financial year, as a result of which the associated GHG emissions become visible in full in the balance for the first time. This is a temporary effect that goes hand in hand with the progress of these investment projects and, after their completion, will no longer arise on this scale.

If the overall picture is adjusted for this special effect, a more nuanced and more gratifying picture emerges: in the highest-volume category 3.1 – Purchased goods and services, the absolute emissions remained almost constant despite increased overnight-stay figures and an associated higher purchasing volume – an indication of initial successes in the optimisation of procurement and the associated emission efficiency. For category 3.4 – Upstream transport and distribution, the calculation methodology was fundamentally revised in the reporting year: instead of the previously applied double counting of supplier journeys, only the distance actually travelled from the original warehouse to the respective hotel or camping site of FMTG is now taken into account. At the same time, in 2025, well-to-wheel (WTW) emission factors were used for the first time, which, in the case of transport, cover the entire energy life cycle from extraction to consumption in the vehicle.

For Scope 3.5 (waste), the more precise recording of the disposal type led to higher data quality but also to increased emissions, while for Scope 3.6 (business travel) – as with upstream transport – the use of WTW factors led to an increase in emissions. Category 3.13 – Leased assets has been completely eliminated from the Scope 3 balance: since the office building in Serbia no longer belongs to FMTG's portfolio, no emissions are reported in this category in the 2025 reporting year. Summarising these developments: without the one-off, investment-related increase in emissions from category 3.15, FMTG's absolute Scope 3 emissions would actually have fallen in the 2025 reporting year compared with the previous year – a result that underlines the continuous progress in the group's operational climate management.

Environmental intensities – Hotel & Camping performance 2025

INTENSITIES HOTEL & CAMPING			
HOTEL & CAMPING PERFORMANCE	**2025**	2024	**CHANGE**
kg CO_2 per bednight (Scope 1 & 2)	5.7	7.1	**-21%**
kg CO_2 per bednight (Scope 3 – excl. 3.15)	13.6	15.4	**-12%**
kg CO_2 per bednight (Scope 1-3 – excl. 3.15)	19.2	22.5	**-15%**
Total energy – kWh/BN	40.6	43.1	**-6%**
Electricity – kWh/BN	17.9	19.2	**-7%**
Thermal energy – kWh/BN	19.9	21.1	**-6%**
kg waste per BN	2.1	2.3	**-6%**
m³ water per BN	0.4	0.4	**0%**

Fig. 18 – Intensities hotel & camping

Change only succeeds when everyone plays their part. Through targeted technical measures and a team that takes responsibility, FMTG works together towards its goals. Because real progress emerges from the interplay of technology and people – and it is precisely this interplay that should be reflected in our figures year after year.

In order to present the environmental performance of the hotel and camping operations in a comparable and traceable manner independently of the respective growth of the group, FMTG reports central environmental metrics normalised per overnight stay (bednight). This presentation is established from the 2025 reporting year as a fixed component of the sustainability reporting and will be continued in the coming years, in order to be able to read off a consistent development over time.

The metrics of the 2025 reporting year paint a gratifying picture: the direct and indirect energy-related emissions (Scope 1 & 2) fell by 21% per overnight stay to 5.7 kgCO_2e, and the total emissions across all scopes – adjusted for the one-off investment effect from category 3.15 – decreased by 15% to 19.2 kgCO_2e. Total energy consumption per bednight was also reduced by 6%, driven by decreases in both electricity and heat consumption. The specific waste volume fell by around 6%, while water consumption remained stable at 0.4 m^3 per overnight stay. The metrics thus demonstrate that FMTG was able to reduce its specific environmental impact per overnight stay in operations – excluding the one-off effect from Scope 3.15 – a trend that will be pursued further in order to specifically improve the operational sustainability performance of FMTG's operations year after year.

3. WATER AND MARINE RESOURCES

[ESRS E3]

INTRODUCTION

Water is an indispensable resource for people, ecosystems and the economy. In particular for the hotel and tourism industry, the availability of high-quality water is of central importance – be it for guest satisfaction, gastronomy, wellness offerings or general operational management.

For FMTG, a responsible handling of water and marine resources is of strategic importance both along its own business activity and in the upstream and downstream value chain. The sustainable use of this resource is essential for the long-term operation of hotels and camping sites – in particular in water-stress-prone regions.

CONNECTION TO OUR CORPORATE VALUES

- Driven for success: We define targets to reduce water consumption and systematically pursue them using digital measuring systems and continuous improvement of our water related processes.
- Grounded: We regard water as a valuable resource and consistently apply water-saving technologies and efficient operating procedures in our businesses.
- Courageous: We invest in innovative technologies for water reduction and treatment, test new concepts such as flow restrictors or alternative sanitary technologies and rely on future-oriented solutions in the planning, construction, and operation of our sites.
- Relationship-oriented: We actively involve guests, employees, and local partners in our efforts to protect water resources and foster a shared sense of responsibility.

MATERIALITY OF THE TOPIC

The environmental aspect of water and marine resources was identified as material within the framework of the double materiality assessment – both with regard to the impacts of FMTG's business activity on water ecosystems and with regard to water-related risks along the value chain.

This chapter contains the corresponding disclosures according to ESRS E3 in conjunction with ESRS 2. This includes information on the material water-related impacts and risks, the underlying processes as well as relevant policies and actions. In addition, specific targets and performance indicators (KPIs) for the sustainable use and protection of water resources are set out.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS E3 in conjunction with ESRS 2]

STRATEGY

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[ESRS 2 SBM-3]

According to ESRS 2 SBM-3 in conjunction with ESRS E3-SBM-3, FMTG reports on its material water-related impacts and risks as well as their interaction with the strategy and business model. No material opportunities relating to water and marine resources were identified.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS E3 including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS E3 (cf. ESRS 2 paragraph 49).

MATERIAL WATER-RELATED IMPACTS

ESRS E3 – WATER AND MARINE RESOURCES: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
High water withdrawal and extensive water consumption from operational hotel and camping activities	FMTG's operations (hotels, camping, wellness, gastronomy) require high water consumption. In water-stress-prone regions – such as Southern Europe or coastal areas – this can lead to usage conflicts, local bottlenecks and a burden on water-relevant ecosystems.	Water resources	Actual negative impact	The use of water resources is structurally anchored in FMTG's business model (e.g. pool, wellness, gastronomy) and is a quality factor of upscale resort hotels. The expansion of water-saving technologies (e.g. sensor technology, flow restriction) is increasingly being anchored strategically.	Own business activity	**Short term:** Impacts on available water resources through ongoing operations. **Medium term:** Burden on local resources in the event of repeated intensive use in areas with increased water stress. **Long term:** Systemic consequences due to structural climate changes (e.g. lower precipitation, rising tourism demand in sensitive regions)	Direct
Increased water consumption due to high food demand	In the upstream value chain there is likewise an intensive use of water resources indirectly, due to the high food demand for gastronomic services. This is based on a water-intensive agricultural and production process.	Water resources	Actual negative impact	The gastronomic offering of a high quality, which is based on a high food demand, is an integral part of the guest experience in FMTG's hotel and camping operations.	Upstream value chain	**Short term:** Water consumption arises directly through the daily procurement of food and everyday goods. **Medium term:** Impacts on water levels, agricultural carrying capacity and local ecosystems in sensitive agricultural areas. **Long term:** Change of ecosystems and usage competition.	Indirect

Fig. 19 – Material impacts ESRS E3

MATERIAL WATER-RELATED RISKS

ESRS E3 – WATER AND MARINE RESOURCES: MATERIAL RISKS									
NAME OF THE RISK	DESCRIPTION OF THE RISK	SUB-TOPIC	TYPE OF RISK	LOCATION IN THE BUSINESS MODEL AND IN THE VALUE CHAIN			INFLUENCE ON STRATEGY, BUSINESS MODEL AND DECISION-MAKING	RESILIENCE OF STRATEGY AND BUSINESS MODEL	CURRENT FINANCIAL EFFECTS ON THE RESULTS OF OPERATIONS AND FINANCIAL POSITION AS WELL AS CASH FLOWS
				OPERATIONAL RELEVANCE	POSITION IN THE VALUE CHAIN	GEOGRAPHICAL CONCENTRATION			
Restriction of business activity as a result of increasing water scarcity	Climate-related changes – dry periods, falling groundwater levels, usage conflicts – increase, at several FMTG sites, the risk of restrictions to business activity due to limited water availability. Affected are above all water-intensive areas (pools, wellness, sanitary facilities, gastronomy); possible consequences are business interruptions, usage requirements or an impaired guest experience.	Water resources	Water-related physical risk	Affected are above all water-intensive services in operations, in particular wellness and pool areas, sanitary facilities as well as gastronomy.	The risk affects both the operational activity and upstream decisions in site planning, construction execution and project development.	Particularly relevant at FMTG sites in Southern Italy, in or near Croatian coastal regions as well as partly in alpine areas of Austria, where seasonal or structural water stress occurs.	**Short term:** Introduction of systematic water-consumption monitoring, initial technical retrofits to increase efficiency, staff training. **Strategic:** Integration of water-related risk indicators into site selection, project development and risk management. **Planned:** Examination of alternative supply systems (e.g. use of grey water or rainwater) as well as relocation of water-intensive offerings to regions with a stable water supply.	Strategic resilience is limited in individual water-scarce regions. Initial countermeasures have been initiated (technical retrofits, inclusion of water availability in project development, examination of self-sufficient solutions). In-depth resilience assessments and scenario analyses according to ESRS 1 Chapter 6 are envisaged.	• Isolated additional costs due to municipal water charges, special levies and official requirements in high-risk regions • Additional operational expenses for consumption control and emergency provision • Investments in water-saving infrastructures and technical retrofits (e.g. fittings, recovery systems)

Fig. 20 – Material risks ESRS E3

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO WATER AND MARINE RESOURCES

[E3-IRO-1]

Reference may be made at this point to the disclosures on ESRS 2 IRO-1 in conjunction with ESRS E3-IRO-1 in the section General information – 10. FMTG's material sustainability topics.

ADDITIONAL INFORMATION ON THE RESULTS OF THE MATERIALITY ASSESSMENT

GEOGRAPHICAL AREAS OF MATERIAL SIGNIFICANCE FOR WATER RESOURCES

[E3 AR 15 lit. a]

- **Italy (in particular Southern Italy and South Tyrol):**
  Seasonal water scarcity with regionally varying water supply; increasing precipitation uncertainty due to climatic changes; burden on public supply networks due to peak tourism activity.
- **Croatia:**
  Limited freshwater reserves near the coast; high consumption volume, especially in the high season in the summer months; risks due to overuse of local groundwater bodies; additional pressure due to possible saltwater intrusion.
- **Austria (alpine and rural regions):**
  – **Alpine regions:** High water availability, but at the same time a great responsibility for the protection of sensitive river catchment areas (e.g. wastewater management, handling of chemical cleaning agents).
  – **Southern Burgenland:** Rural region with partly small-scale supply systems; limited public infrastructure with regard to water recovery and seasonal bottlenecks in dry periods.

RAW MATERIALS RELATED TO MARINE RESOURCES USED BY THE COMPANY

[E3 AR 15 lit. b)]

- **Fish and seafood:**
  Use in the hotel kitchens at all sites – in particular in Italy and Croatia; the focus is on origin and the most sustainable fishing possible.
- **Gravel and sand from near-coastal extraction:**
  Use for construction, conversion or renovation activities (e.g. foundation work, terraces, paths); a potential impairment of marine ecosystems is taken into account in the supplier selection and site planning.

SECTORS/SEGMENTS WITH MATERIAL IMPACTS, RISKS AND OPPORTUNITIES IN CONNECTION WITH WATER AND MARINE RESOURCES

[E5 AR 15 lit. c]

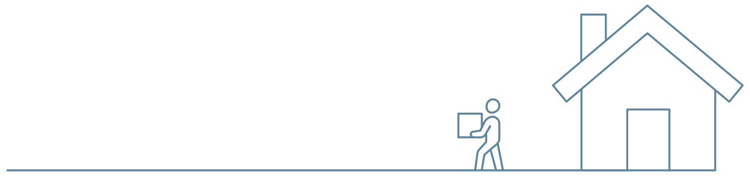
- **Tourism operations (hotel and camping offerings):**
  Direct water consumption for pools, wellness areas, kitchens, laundry and cleaning; high consumption peaks in the summer months and holiday periods; possible impacts on the local resource situation.
- **Construction and project development:**
  Relevance due to water consumption in construction processes (e.g. concrete mixing, cooling, cleaning), possible discharges into soil or sewers; indirect burden on resources through material use.
- **Procurement (upstream value chain):**
  High virtual water volume in the production of food (above all meat, fruit and vegetables, beverages), textiles (e.g. laundry processes) and furnishings (e.g. ceramic products, furniture).

POLICIES, ACTIONS AND TARGETS RELATED TO WATER AND MARINE RESOURCES

[E3-1; E3-2; E3-3]

TARGETS

In the 2025 reporting year, within the framework of its ESG strategy, FMTG further specified its targets relating to water and marine resources group-wide and, for the first time, brought them together in a structured system of targets with defined time horizons. The following overview provides an overview of the material targets that apply to hotel and camping operations as well as to the corporate level.



WATER RESOURCES				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Ensuring a fully digitalised water-consumption recording of all hotel and camping operations	2027	✓	✓	
Reduction of water flow rates to the standard of the EU Taxonomy/the EU Ecolabel at all hotel & camping operations (focus on public/common areas & rooms)	2027	✓	✓	
Use of rainwater, grey water or other alternative water sources for irrigating green spaces at all hotel & camping operations (where technically possible and economically viable)	2030	✓	✓	
Use/installation of alternative water-supply sources for hotel and camping operations in areas with increased water stress (where technically possible and economically viable)	ongoing	✓	✓	
Raising awareness and positively influencing the consumption behaviour of hotel & camping guests through active communication of KPIs & measures	ongoing	✓	✓	

Fig. 21 – Targets ESRS E3

ACTIONS

FMTG continues to pursue a systematic approach to the sustainable use and protection of water resources over the entire life cycle of its hotel and tourism infrastructure.

In the development of new hotel and camping sites and especially in their operation, a responsible and economical handling of the resource water is maintained. The implementation of water-protection measures in construction operations, the installation of water-saving fittings and the use of grey water and rainwater for green-space irrigation are some of the measures that were also gradually advanced in 2025.

Comprehensive digitalised water consumption monitoring

The complete, cross-site recording of water withdrawals, consumption and discharges via remotely readable meters remains a central field of action in the 2025 reporting year as well. In this period, 91% of the recorded water consumption continued to be based on actual measured values. FMTG is consistently driving this degree of digitalisation forward in order to be able to manage water-related impacts even more precisely and to systematically identify savings potential.

Water-consumption reduction in operations

The reduction of water consumption in the hotel and camping operations remains a continuous target of FMTG. A particular focus in the 2025 reporting year was on the certification of all Austrian hotels with the Austrian Ecolabel and the EU Ecolabel. Both certifications set concrete requirements for operational water management: water-saving fittings with defined flow rates are used and sanitary areas are gradually retrofitted with flow restrictors. In addition, certified operations undertake to actively raise guests' awareness of a conscious use of water – for example through targeted communication in favour of the consumption of high-quality tap water instead of bottled mineral water, which at the same time reduces packaging waste. In addition, the avoidance of unnecessary laundry cycles through voluntary guest programmes as well as the use of environmentally compatible cleaning agents to protect aquatic ecosystems are a fixed component of the certification requirements. In new-build projects, fittings are already used in the planning phase that comply with the flow-rate requirements of the EU Taxonomy Regulation within the framework of the environmental objective "sustainable use and protection of water and marine resources".

Use of alternative water sources

In the 2025 reporting year, around 20% of the water demand of the hotel and camping operations came from alternative sources such as seawater desalination plants and on-site wells – predominantly for irrigation and operational purposes – and thus relieved the public water supply accordingly. At the Falkensteiner Resort Punta Skala, consisting of the Hotel & Spa Iadera, the Family Hotel Diadora, the Residences Senia as well as the Falkensteiner Luxury Villas, a seawater desalination plant is used. Through this, the water supply of the entire resort is achieved without using the public water network, by desalinating seawater and treating it for use in operations. In addition, FMTG relies on alternative water sources such as rainwater and grey water as well as the use of lake water in particular for garden and landscape maintenance, in order to minimise the withdrawal from freshwater sources. In order to minimise the use of drinking water for the irrigation of green spaces, 17 hotel and camping operations already use alternative water sources for irrigation or, where possible, dispense with irrigation systems entirely.

FMTG systematically analyses all sites with regard to water-stress risks. The basis for this is the Aqueduct Water Risk Atlas of the World Resources Institute. This analysis was carried out for the first time in the 2025 reporting year and will be continued in 2026. The results show that 81% of the water consumption of the hotel and camping operations is attributable to regions with low ("Low"), 2% to regions with low-medium ("Low-Medium"), 4% to regions with medium to high ("Medium-High") and 13% to regions with extremely high ("Extremely High") water stress. The latter comprise exclusively sites in Southern Italy. For these high-risk sites, FMTG develops targeted action plans in order to reduce water withdrawals and to strengthen operational resilience to water-related risks.

FMTG continuously implements measures both in new-build projects and at existing accommodation operations that pursue the goal of continuously reducing water consumption.

POLICIES

For the 2026 financial year, it is planned to bring together all targets and measures relating to water and marine resources in an "Environmental Policy" and to formally anchor them, in order to create a binding management framework that links ecological ambition with measurable target values and clear responsibilities.

METRICS RELATED TO WATER RESOURCES

[E3-4]

WATER CONSUMPTION

[E3-4.28]

WATER CONSUMPTION (M^3)	2025	2024
Total water consumption	781,381	730,460
Total water consumption in areas at water risk, including areas of high water stress	133,523	112,006
Total water recycled and reused	83,081	73,958
Total volume of stored water	-	-
Changes in storage	-	-

Fig. 22 – Water consumption

FMTG's total water consumption rose by around 7% in the 2025 reporting year – proportionally to the development of the group-wide bednights. The specific consumption per overnight stay thus remained stable compared with the previous year, which, in view of the group-wide roll-out of water-saving measures not yet being complete, is to be assessed as positive. The increase in water consumption in areas with water stress is attributable to the increased operational occupancy of the hotel operations in Calabria and Capo Boi and reflects the positive business development at these sites.

WATER INTENSITY

[E3-4.29]

WATER INTENSITY PER NET REVENUE (M^3 PER EUR '000)	2025	2024
Water intensity per net revenue	3.00	2.97
Changes in storage	-	-

Fig. 23 – Water intensity per net revenue

4. BIODIVERSITY AND ECOSYSTEMS

[ESRS E4]

INTRODUCTION

The preservation of biodiversity and the protection of functioning ecosystems are essential prerequisites for sustainable tourism. Intact landscapes, species-rich habitats and ecological diversity contribute decisively to the attractiveness of tourism destinations and, at the same time, secure fundamental ecosystem services such as sufficient water storage, pollination, climate regulation or soil health. The increasing loss of biodiversity and the progressive fragmentation of habitats therefore represent not only an ecological but also an economic risk for the tourism industry.

FMTG recognises the importance of healthy ecosystems for long-term successful hotel, camping and development activities. The aim is to preserve natural habitats along the entire value chain, to minimise impairments and – where possible – to contribute to ecological enhancement. Particular importance is attached to the respectful handling of sensitive natural areas at all sites and to the integration of biodiversity-promoting measures into operational and development processes.

CONNECTION TO OUR CORPORATE VALUES

FMTG's commitment in the field of biodiversity and ecosystem protection is closely linked to its core values:

- Driven for success: We pursue clear goals for the protection of biodiversity – for example, through near-natural landscaping and the promotion of native species – and continuously develop our measures further. In doing so, we are guided by recognised environmental standards and international biodiversity objectives.
- Grounded: We respect nature at our sites and ensure that our green spaces are designed as close to nature as possible. We strive to avoid or offset interventions in sensitive habitats as far as possible.
- Courageous: We support the reduction of land sealing and the promotion of natural areas and biodiversity – especially in the regions of our hotels and development projects that are located in or near protected areas.
- Relationship-oriented: We work together with our stakeholders to jointly implement measures for the protection and restoration of biodiversity.

MATERIALITY OF THE TOPIC

The topic area "biodiversity and ecosystems" was classified as material within the framework of the double materiality assessment.

This chapter therefore discloses the information required according to ESRS E4 in conjunction with ESRS 2. This includes information on the strategic relevance of the topic, information on the material impacts relating to biodiversity and ecosystems, on the underlying processes as well as disclosures on policies, actions, targets and relevant metrics (KPIs).

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS E4 in conjunction with ESRS 2]

STRATEGY

TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

[E4-1]

The insights from the identification of the material impacts (see in detail the disclosures on E4-SBM-3 as well as E4-IRO-1) in connection with biodiversity and ecosystems increasingly feed into the strategic orientation and the further development of the business model, in order to strengthen resilience to biodiversity risks and to ensure compatibility with biodiversity-relevant targets.

A biodiversity-specific resilience analysis was not yet carried out in 2025. With a view to the next reporting periods, such an analysis is envisaged.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[E4-SBM-3]

According to ESRS 2 SBM-3 in conjunction with ESRS E4-SBM-3, FMTG reports on the material impacts in connection with biodiversity and ecosystems as well as their interaction with the strategy and business model. No material financial risks and opportunities were identified in relation to biodiversity and ecosystems.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS E4 including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS E4 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS RELATED TO BIODIVERSITY AND ECOSYSTEMS

ESRS E4 – BIODIVERSITY AND ECOSYSTEMS: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
Disruption of the natural processes of flora and fauna by hotel operations and guests	Hotel and camping operations impair the surrounding habitats of plants and animals as well as their natural processes. For example, night-time lighting can disturb the biorhythm of nocturnal animal species, in particular at sites near sensitive habitats (e.g. alpine regions, lakes, coastal areas).	Impacts on the extent and condition of ecosystems	Actual negative impact	The tourism use of near-natural spaces – above all in the camping segment – is an integral part of FMTG's business model and requires a sensitive management of ecological impacts. Visitor guidance, nature-compatible lighting concepts and guest information are relevant management instruments that will be pursued more strongly in the future.	Own business activity	**Short term:** Impairment of behaviour as well as the retreat of sensitive animal species due to lighting, noise or guest frequency. **Medium term:** Changed species composition or decline of local populations in the event of persistent disturbance. **Long term:** Permanent loss of ecological functions in used or adjacent habitats.	Direct
Reduction of the habitats of flora & fauna through the sealing of land surfaces	Newly constructed hotel and camping sites of FMTG lead to additional sealing of natural soil and grassland areas, unless already sealed areas (e.g. former industrial land) are used. The sealing displaces existing habitats and permanently impairs the regeneration of ecosystems.	Impacts on the extent and condition of ecosystems	Actual negative impact	The development of new sites is an essential pillar of FMTG's business model; at the same time, the preservation of ecological and landscape quality is central to tourism success. Avoidance and minimisation of sealing – through compact construction, land reuse or offsetting measures – is part of the development sustainability strategy.	Own business activity (project development, planning, commissioning of construction services for hotel and infrastructure projects); execution by external construction companies on behalf of FMTG as the client	**Short term:** Immediate loss of vegetation areas and microhabitats through construction and sealing. **Medium term:** Impairment of ecological network systems (e.g. disruption of migration corridors, retreat areas). **Long term:** Permanent reduction of biodiversity and ecosystem resilience through irreversible land losses.	Direct (via site selection, land planning and client role)
Loss of biodiversity due to high food use and the associated resource-intensive production	The high food demand of operations (hotels, gastronomy, camping) burdens global ecosystems. The intensive agriculture required for this leads, in the supply chain, to deforestation, monocultures, soil overuse and high water consumption – with direct consequences for species diversity through the loss of natural habitats.	Direct impact drivers of biodiversity loss	Actual negative impact	Culinary quality is another central performance promise of FMTG. At the same time, the conversion to regionally, ecologically and biodiversity-friendly produced food offers considerable ecological leverage.	Upstream value chain (food production, processing and purchasing)	**Short term:** Impacts arise directly upon the procurement of conventionally produced products (e.g. monocultures, industrial animal husbandry). **Medium term:** Loss of site-typical species and ecosystem services along global agricultural supply chains. **Long term:** Irreversible decline of ecological diversity and agricultural resilience.	Indirect (via supplier selection, purchasing standards and menu planning)

Fig. 24 – Material impacts ESRS E4

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

[E4-IRO-1]

Reference may be made at this point to the disclosures on ESRS 2 IRO-1 in conjunction with ESRS E4-IRO-1 in the section General information – 10. FMTG's material sustainability topics.

POLICIES, ACTIONS AND TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

[E4-2; E4-3; E4-4]

TARGETS

In the 2025 reporting year, within the framework of its ESG strategy, FMTG further specified its targets relating to biodiversity and ecosystems group-wide and, for the first time, brought them together in a structured system of targets with defined time horizons. The following overview provides an overview of the material targets that apply to hotel and camping operations as well as to the corporate level.

NATURE AND BIODIVERSITY				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Establishment of at least 5% of green spaces as high-quality biodiversity areas (exception: city hotels)	2027	✓	✓	
Active cooperation with & promotion of nature reserves in the vicinity of the hotel and camping operations	ongoing	✓	✓	
Active communication & raising guests' awareness of correct behaviour in nature reserves in the vicinity of the hotel and camping operations	ongoing	✓	✓	
Increasing the share of organic products as well as regional products (food) to the standard of the Austrian Ecolabel at all hotel & camping operations (where available and economically viable)	2028	✓	✓	

Fig. 25 – Targets ESRS E4

ACTIONS

Based on the results of the materiality assessment as well as on FMTG's experience, the following measures were implemented or successfully continued from the previous year in the area of biodiversity and ecosystems in the 2025 reporting year:

High-quality biodiversity areas and avoidance of invasive plant species

In the design of green spaces, care is taken to refrain from the use of non-native invasive species in order to minimise negative effects on the local ecosystems.

At two sites in Austria, measures are currently being implemented:

- In Upper Austria, at the site of the Falkensteiner Hotel Bad Leonfelden, a conservation meadow covering an area of 2.7 hectares was created in cooperation with a local organisation and is actively maintained. Through extensive management, habitat is created for wild bees, insects, reptiles and ground-nesting birds.
- At the Falkensteiner Balance Resort Stegersbach in Burgenland, the largest hotel-owned permaculture garden in Austria is operated on the property. On an area of 5,000 m², or 0.5 hectares, a diversity of 60 vegetable varieties, fruit trees and herbs is cultivated, while care is taken to lay out the garden as a diverse, near-natural, resilient and, as far as possible, self-regulating ecosystem.

In the coming years, FMTG will systematically evaluate the green spaces of its existing hotel and camping operations in order to identify the use of non-native species and to gradually replace them with site-typical, local planting. The aim is not only to design new-build projects from the outset according to near-natural and ecologically resilient principles, but also to actively develop the existing portfolio further towards biodiversity-promoting and site-appropriate ecosystems.

Raising awareness among guests and employees

In excursions offered by protected areas, guests and employees are informed about the special features of the respective protected areas as well as about correct behaviour during their stay.

Falkensteiner Hotels & Residences also rely on an innovative edutainment concept that combines education and entertainment. The focus is on nature, sports, science, creativity, and play, complemented by pedagogical approaches such as Montessori methods. Regionally, the programme is extended and adapted through the so-called Ecotainment concept, which conveys environmental education in a playful way and introduces children of all ages to sustainable topics.

FMTG attaches importance to the preservation and promotion of biodiversity, especially in regions in which its hotels and camping sites are operated. In the 2025 reporting year, therefore, as in the previous year, the distance of the hotel and camping operations from areas worthy of protection (Natura 2000) was analysed. The number of sites in or near protected areas remained identical compared with the previous year 2024. See the table below for this.

COUNTRY	NUMBER OF SITES WITHIN A NATURA 2000 SITE	NUMBER OF SITES IN THE VICINITY (< 2 KM) OF A NATURA 2000 SITE
Austria	0	3
Italy	0	2
Croatia	1	3
Czech Republic	0	1
Slovakia	0	1
Slovenia	0	1

Fig. 26 – Sites in or near protected areas

In the first step, all sites were analysed in order to identify whether and which protected areas are in the extended vicinity of the operations. The focus was on all those areas worthy of protection where an FMTG operation is up to 2 kilometres away. In this way, 11 operations could be identified that are located in the vicinity of a protected area. One of these is additionally located within a protected area.

A more far-reaching analysis of the potential negative impacts that arise from the regular operation of the hotel and camping operations on adjacent protected areas has not yet been carried out. Such an analysis is planned for the coming reporting periods.

Irrespective of this, however, FMTG has set itself the goal, in the area of biodiversity and ecosystems, of making a positive contribution through future active cooperation with protected areas, continuous awareness-raising among guests and employees as well as through biodiversity-promoting areas at all sites.

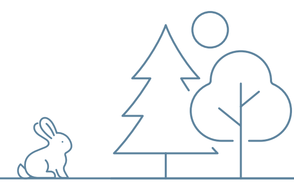
POLICIES

For the 2026 financial year, it is planned to bring together all targets and measures relating to biodiversity and ecosystems in an “Environmental Policy” and to formally anchor them, in order to create a binding management framework that links ecological ambition with measurable target values and clear responsibilities. In this context, the establishment of high-quality biodiversity areas, active cooperation with protected areas, the raising of awareness among guests and employees as well as the increased use of organic products in hotel operations will play a significant role.

IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE

[E4-5]

The disclosure of metrics relating to ESRS E4 was assessed as not material for reporting purposes. Further reporting is therefore not required (2024: identical).



Tourism consumes resources – but it does not have to lose them: FMTG thinks about its material flows in cycles, from purchasing through to disposal.

5. RESOURCE USE AND CIRCULAR ECONOMY

[ESRS E5]

INTRODUCTION

Responsible use of natural resources and consistent alignment with the principles of the circular economy are central levers for reducing environmental impacts in the tourism industry. A future-proof tourism model requires closing material cycles, reducing waste, and using resources efficiently – both in day-to-day hotel operations and in the development and maintenance of tourism infrastructure.

The ESRS E5 standard contains requirements regarding resource use, waste management, and measures to promote circular processes. The focus is particularly on resource efficiency, product durability, reuse of materials, and dismantling and recyclability. For FMTG, this primarily means taking a holistic view of material flows in its operations – from furniture to cleaning products to gastronomy. FMTG also relies on resource-saving solutions in camping sites and project developments, for example through the use of sustainable building materials, dismantling options, and targeted waste separation on construction sites.

CONNECTION TO OUR CORPORATE VALUES

Our commitment in the area of resource use and circular economy is closely linked to the core values of FMTG:

- **Driven for success:** We continuously work on systematically and measurably improving resource use in our operations – from procurement to use to disposal.
- **Grounded:** We rely on proven, durable materials and on responsible, sustainable procurement.
- **Courageous:** We test innovative approaches – such as modular construction concepts or circular building materials.
- **Relationship-oriented:** We actively involve our supply chains in order to jointly identify and implement circular solutions.

MATERIALITY OF THE TOPIC

The topic area “resource use and circular economy” was identified as material in the course of the double materiality assessment with regard to the ecological impacts of FMTG’s business activity.

This chapter therefore discloses the information according to ESRS E5 in conjunction with ESRS 2. This includes information on the identified material impacts together with the underlying processes. In addition, information on policies, actions, targets as well as relevant metrics (KPIs) in connection with resource conservation and circularity is set out.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS E5 in conjunction with ESRS 2]

STRATEGY

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[ESRS 2 SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS E5-SBM-3 on its material impacts in connection with resource use and circular economy and their interaction with the strategy and business model. No material financial risks and opportunities were identified in relation to this environmental aspect.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS E5, including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS E5 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

ESRS E5 – RESOURCE USE AND CIRCULAR ECONOMY: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
High resource consumption in the upstream value chain (above all due to construction activity)	The construction and expansion of hotel and camping sites cause a considerable consumption of non-renewable resources – mineral raw materials (e.g. sand, gravel, limestone), metals, wood as well as energy-intensive materials such as cement and steel. Their extraction frequently leads to land-use conflicts, habitat losses and ecological interventions in extraction regions.	Resource inflows, including use	Actual negative impact	Construction activity is, for FMTG as an operator and project developer of tourism infrastructure, a central component of its corporate strategy. Sustainability requirements for building materials and circular construction methods are taken into account in new projects – above all within the framework of building certification – but are not yet managed comprehensively.	Upstream value chain	**Short term:** Resource consumption and environmental burden arise directly through ongoing (construction) projects. **Medium term:** Recurring construction activity increases the demand for raw materials and perpetuates usage patterns. **Long term:** Excessive consumption of non-renewable resources contributes to the depletion of natural reserves and to the degradation of ecosystems.	Indirect
Increased resource consumption in upscale hotels and in the upstream value chain	High-quality furniture, decoration, equipment and textiles as well as the daily consumption of cosmetics, cleaning agents and office supplies cause a continuous use of resources. In addition to manufacturing, it is above all the short lifespan or high replacement frequency that has an effect – both natural and petrochemical materials are affected.	Resource inflows, including use	Actual negative impact	FMTG's upscale family resort hotel performance promise is based on high quality standards in furnishings and ambience. Resource-conserving product design, longevity and circularity have so far played a subordinate role in procurement but are increasingly receiving attention in the strategic further development.	Upstream value chain	**Short term:** Resource consumption is ongoing through daily operational processes and re-procurement. **Medium term:** Recurring demand arises through replacement cycles and standardisation. **Long term:** The permanent demand for primary raw materials perpetuates linear economic structures.	Indirect
Causing large quantities of waste through operational hotel activities	In day-to-day hotel operations, considerable quantities of residual, packaging, food and hygiene waste arise. In part, a consistent separation is lacking, and many products are individually packaged or delivered without a take-back option. This burdens local waste infrastructures and leads to the landfilling or incineration of potentially recyclable materials.	Waste	Actual negative impact	High waste volumes are an ecological and operational challenge: they cause costs, burden local infrastructures and impair the sustainability image. Targeted waste management (avoidance, reusables, sustainable procurement) supports FMTG's strategic goals and strengthens the future viability of the business model.	Own business activity	**Short term:** Waste volumes arise daily and are highly site-dependent. **Medium term:** Without countermeasures, they rise proportionally to occupancy and comfort level. **Long term:** The system remains oriented towards linear consumption and reinforces ecological as well as economic inefficiencies.	Direct and indirect, depending on (individual) guest behaviour

Fig. 27 – Material impacts ESRS E5

Circular economy does not start with recycling alone – FMTG consistently factors it in, from site planning through to day-to-day hotel operations.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

[E5-IRO-1]

Reference may be made at this point to the disclosures on ESRS 2 IRO-1 in conjunction with E5-IRO-1 in the section General information – 10. FMTG's material sustainability topics.

POLICIES, ACTIONS AND TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

[E5-1; E5-2; E5-3]

TARGETS

In the 2025 reporting year, within the framework of its ESG strategy, FMTG further specified its targets relating to resource use and circular economy group-wide and, for the first time, brought them together in a structured system of targets with defined time horizons. The following overview provides an overview of the material targets that apply to hotel and camping operations as well as to the corporate level.

RESOURCE USE AND CIRCULAR ECONOMY				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Ensuring comprehensive waste separation & measurement for all hotel and camping operations (quantities & recycling rates)	2028	↖	↖	
Establishment of the effective measurement of food waste in hotel operations	2027	↖	↖	
Increasing the share of resource-conserving & CO_2-reduced building materials in new projects in Development	ongoing	↖	↖	↖
Reduce packaging waste (plastic & paper) of delivered goods – target: 10%	2030	↖	↖	
Minimise single-use products in rooms and common areas	ongoing.	↖	↖	
100% of customer-side consumer materials in the room with sustainability certificates (where available and economically viable)	2028	↖	↖	

Fig. 28 – Targets ESRS E5

ACTIONS

Already in the 2024 reporting year, FMTG identified the most important topic areas for the definition of measures, both through the double materiality assessment and through the analysis of existing regulation, consideration of market trends and on the basis of many years of experience. In doing so, the fields of action of waste separation and measurement, food waste, sustainable real-estate development, ecological consumer materials and packaging waste were defined as core topics.

In the 2025 reporting year, FMTG continued and partly expanded the following measures, which illustrate the approach in the area of resource use and circular economy.

Waste separation, recycling and avoidance of food waste

FMTG pursues the goal of breaking up linear material flows and increasingly regarding waste from the hotel and camping operations as a resource. In the 2025 reporting year, significant steps were taken within the framework of the certification with the Austrian Ecolabel and the EU Ecolabel: in Austria, guest separation stations were expanded and the introduction of a uniform waste labelling was begun group-wide – in order to offer employees a consistent approach that also applies in cross-site deployments. The complete roll-out will take place in 2026, taking into account national requirements in all FMTG markets.

In parallel, waste-data recording was placed on a more strongly quantity-based basis in order to be able to identify operational hotspots more specifically. In 2026, these insights will, as planned, be deepened through on-site analyses in pilot operations – with a particular focus on food waste, the sources of which are to be systematically categorised and addressed with adequate measures. Existing measures to reduce food waste, such as reduced portion sizes at buffets, light-lunch formats and further processing in the staff canteen, are continued on an ongoing basis.

Sustainable project development

FMTG's two largest development projects – the hotel in Salò on Lake Garda as well as the project in Licata in Sicily – achieved significant construction progress in the 2025 reporting year and are thus largely responsible for the increase in emissions in category 3.15. Both projects are constructed in accordance with the requirements of the EU Taxonomy Regulation; the project in Salò is additionally certified according to the standards of the German Sustainable Building Council (DGNB). In this way, FMTG ensures that circular economy and resource conservation – in particular through the reduction of construction and demolition waste as well as the reuse of materials – are integrated into project development from the outset. The group sets this standard as a benchmark for future new developments.

Avoidance of single-use plastic bottles for hotel guests

In the 2025 reporting year, FMTG converted the drinking-water bottles for hotel guests from single-use plastic bottles to carton-based composite packaging from the supplier Aqualy. According to the manufacturer, the packaging consists of more than 70% plant-based materials, is BPA-free and FSC-certified and is designated as recyclable. The measure directly addresses the group's targets of avoiding single-use products in operations and expanding the share of certified, resource-conserving consumer materials. It is exemplary of FMTG's approach of gradually replacing linear material flows in guest operations with circular-economy-compliant alternatives.

POLICIES

For the 2026 financial year, it is planned to bring together all targets and measures relating to resource use and circular economy in an "Environmental Policy" and to formally anchor them, in order to create a binding management framework that links ecological ambition with measurable target values and clear responsibilities.

METRICS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

RESOURCE INFLOWS

[E5-4]

FMTG does not consume any raw materials (natural resources that are converted into products or services) that are transformed within the framework of FMTG's activities in order to produce specific goods or services. Specifically, FMTG consumes inputs, understood as finished products and services that are made available to guests in the hotels in order to ensure day-to-day operations.

Information on the weight of resource inflows was therefore assessed as not relevant for information or reporting purposes.

RESOURCE OUTFLOWS

[E5-5]

WASTE

Total amount of waste generated (incl. breakdown)

[E5-5.37]

WASTE QUANTITIES (T)	2025	2024
Total amount of waste generated	4,422	4,422
Total amount of waste diverted from disposal	1,270	133
Waste amount – preparation for reuse	-	-
Waste amount – recycling	1,179	41
Waste amount – other recovery operations	91	92
Total amount of waste directed to disposal	3,152	4,288
Waste amount – incineration	938	19
Waste amount – landfill	2,124	785
Waste amount – other disposal operations	90	3,484
Total amount of non-recycled waste	3,243	4,380
Percentage of non-recycled waste (%)	73%	99%

Fig. 29.1 – Waste quantities

Composition of waste

[E5-5.38]

COMPOSITION OF WASTE (T)	2025	2024
Residual waste	2,061	2,865
Organic and garden waste	1,022	731
Glass waste	296	365
Paper waste	471	343
Metal waste	485	69
Plastic waste	54	40
Hazardous liquid waste	1	6
Kitchen and food waste	-	2
Batteries	-	2
Electronic devices	1	1
Other	31	0

Fig. 29.2 – Composition of waste

Hazardous waste and radioactive waste

[E5-5.39]

HAZARDOUS AND RADIOACTIVE WASTE (T)	2025	2024
Waste amount – hazardous waste	9.72	7.74
Waste amount – radioactive waste	-	-

Fig. 29.3 – Hazardous and radioactive waste

Background information on the methodology

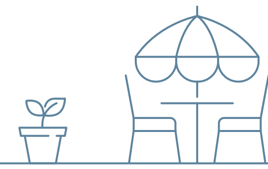
[E5-5.40]

In the 2025 reporting year, the data quality of the waste collection was further improved: expenditure-based estimates are eliminated entirely; remaining data gaps were closed through extrapolations based on comparable sites within the group-wide portfolio.

The share of recycled waste rose from 1% in the previous year to 27%, which is primarily attributable to the improved data basis. As information on the recycling rates and methods of the commissioned disposal companies is still not available for individual sites, it can be assumed that the actual recycling rate is higher than the reported value. FMTG works continuously to improve data availability in this area.

The share of residual waste in the total waste volume fell from around 65% (2024) to around 47%. This development reflects the first measurable successes of the group-wide efforts to separate waste and reaffirms the course taken towards a more consistent circular economy in the hotel and camping operations.

The increase in hazardous waste compared with the previous year is attributable to individual conversion measures as well as hazardous waste arising within the framework of regular hotel operations and does not represent a structural change.



3 SOCIAL INFORMATION

1. OWN WORKFORCE

[ESRS S1]

INTRODUCTION

Employees are the backbone of every tourism offering – particularly in upscale holiday hospitality, where personal care, service quality, and authenticity are decisive success factors. The demands for flexibility, presence, and communication skills are high – as are the expectations for a responsible and appreciative working environment.

ESRS S1 Own workforce requires undertakings to systematically record and disclose the impacts of their business activity on their own workforce. The focus is in particular on information on working conditions, forms of employment, remuneration, health and safety, equal opportunities, training measures as well as involvement in social dialogue processes.

For FMTG, the topics of work quality and employee retention are of particular strategic relevance. As an operator of hotels, camping sites and tourism development projects in several European countries, the group employs an average of around 2,400 employees. FMTG's aim is to provide a working environment that combines stability, development opportunities and lived appreciation.

CONNECTION TO OUR CORPORATE VALUES

Our actions in relation to our own workforce are guided by FMTG's core values as follows:

- **Driven for success:** We promote diverse training and further education, leadership programmes, and career opportunities.
- **Grounded:** We act pragmatically, responsibly, and with a clear focus on the well-being of our employees.
- **Courageous:** We drive diversity and inclusion and aim to set new standards for contemporary employer brands in tourism.
- **Relationship-oriented:** We foster long-term relationships through fair working conditions, open communication, and lived appreciation.

MATERIALITY OF THE TOPIC

The social sustainability aspect "own workforce" was classified as material in the course of the double materiality assessment – both with regard to the impacts of FMTG's business activity on its own employees and with regard to financial risks that influence FMTG in this context.

This chapter therefore discloses the information required by ESRS S1 in conjunction with ESRS 2. This includes information on governance, on strategy as well as on the material impacts, risks and the underlying process relating to the own workforce. In addition, disclosures are made on policies, targets, actions and relevant performance indicators (KPIs).

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS S1 in conjunction with ESRS 2]

STRATEGY

INTERESTS AND VIEWS OF STAKEHOLDERS

[S1-SBM-2]

Reference may be made at this point to the relevant disclosures on S1-SBM-2 in the section *General information – 9. Stakeholders.*

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[S1-SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS S1-SBM-3 on material impacts and risks relating to the own workforce as well as their interaction with the strategy and business model. No material opportunities were identified in this respect.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS S1 including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS S1 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES RELATING TO THE OWN WORKFORCE

Material impacts on the own workforce

ESRS S1 – OWN WORKFORCE: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
Partly limited sense of comfort due to quality differences in staff accommodation	At several seasonally characterised sites, FMTG provides its employees with accommodation. The furnishing standards can vary depending on the site; possible consequences are a limited sense of comfort and increased dissatisfaction.	Working conditions	Actual negative impact	High-quality staff accommodation is a strategic component of staff recruitment. A company-wide quality strategy for this accommodation is currently in development.	Own business activity	**Short term:** Lower sense of comfort and a lack of appreciation compared with employees of other operations. **Medium term:** Effects on job satisfaction and staff retention. **Long term:** Potential loss of reputation and lower attractiveness as an employer.	Direct
Employment insecurity due to seasonal employment of employees	Many employees are on fixed-term and seasonal contracts – in particular at sites with tourism-driven demand at certain times of the year (above all summer and winter tourism). This can lead to employment insecurity as well as lower identification with the operation or FMTG.	Working conditions: Secure employment	Actual negative impact	FMTG operates numerous sites with strongly seasonally characterised demand. Seasonal personnel planning is a structural necessity in the business model. Measures for better integration and recurring employment are planned.	Own business activity	**Short term:** Limited sense of job security in ongoing operations. **Medium term:** Reduced development opportunities and lower operational retention. **Long term:** Structural challenges in staff recruitment.	Direct
Dissatisfaction due to lower remuneration in relation to other economic sectors	The wage level in the tourism industry is frequently below that of other economic sectors with comparable requirements. This concerns in particular seasonal and operational activities. The consequence is potential dissatisfaction, willingness to change or migration to better-paid industries.	Working conditions: Adequate wages	Actual negative impact	As a tourism company, FMTG is subject to industry-standard conditions, including collective agreements. A strategic positioning via additional benefits, career models or non-monetary incentives is in place and is continuously revised and updated.	Own business activity	**Short term:** Dissatisfaction due to the (subjective) perception of income inequality. **Medium term:** Effects on staff retention and turnover. **Long term:** Effects on employer attractiveness and staff availability.	Direct
Dissatisfaction due to inadequate social dialogue	At certain FMTG sites with low participation in decision-making processes and insufficient communication, dissatisfaction, misunderstandings or a sense of a lack of appreciation can arise.	Working conditions: Social dialogue	Actual negative impact	FMTG faces the challenge of ensuring a satisfactory social dialogue with several thousand employees at diverse sites in various countries. The continuous improvement of uniform communication channels is strategically anchored; measures such as regular employee surveys are implemented and are being expanded.	Own business activity	**Short term:** Dissatisfaction where there is a lack of say. **Medium term:** Loss of trust and disrupted communication. **Long term:** Impairment of the working atmosphere and cooperation.	Direct
Employment security through stable employment relationships	Long-term employment relationships, recurring seasonal employment as well as permanent contracts contribute to the stability of employment. In many FMTG operations there are long-standing workforces, which increases predictability for employees.	Working conditions: Secure employment	Actual positive impact	Reliable, long-term employment across several seasons is a target of personnel management, in order to sustainably secure quality and know-how and at the same time to reduce departures and turnover.	Own business activity	**Short term:** Stable employment relationships have an immediate positive effect on satisfaction. **Medium term:** Promotion of loyalty and willingness to perform. **Long term:** Positive effects on the employer brand and operational resilience.	Direct
Promotion of the recovery of employees	To promote health, recovery and well-being, FMTG provides its employees with targeted offerings – including attractive employee rates in its own hotels, discounted wellness services, bike leasing and fitness programmes. These measures strengthen physical and mental well-being and promote the satisfaction of employees as well as the long-term retention within the company.	Entity-specific aspect	Actual positive impact	The promotion of employees' health and recovery is directly linked to FMTG's business model. As a provider of holistic holiday experiences, FMTG enables its workforce to benefit from recovery- and health-promoting services themselves. This strengthens staff retention and fosters a deeper understanding of the company's own service quality.	Own business activity	**Short term:** Direct improvement of well-being and health when using the corresponding offerings. **Medium term:** Reduction of stress symptoms and absences. **Long term:** Strengthening of employer retention and reduction of turnover.	Direct

Fig. 30 – Material impacts ESRS S1

Material risks related to own workforce

ESRS S1 – OWN WORKFORCE: MATERIAL RISKS									
NAME OF THE RISK OR OPPORTUNITY	DESCRIPTION OF THE RISK OR OPPORTUNITY	SUB-TOPIC	TYPE OF RISK	LOCATION IN THE BUSINESS MODEL AND IN THE VALUE CHAIN			INFLUENCE ON STRATEGY, BUSINESS MODEL AND DECISION-MAKING	RESILIENCE OF STRATEGY AND BUSINESS MODEL	CURRENT FINANCIAL EFFECTS ON FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS
				OPERATIONAL RELEVANCE	POSITION IN THE VALUE CHAIN	GEOGRAPHICAL CONCENTRATION			
Shortage of (qualified) workers in tourism and hotels	In certain operational units there is a shortage of qualified skilled workers – in particular in kitchen, service, technology and reception. The causes are structural labour-market developments, seasonal fluctuations and an industry-wide declining attractiveness of tourism and gastronomy professions. This jeopardises staff availability, increases recruitment costs and places a burden on employees as well as service quality.	Entity-specific	Structurally driven risk (labour-market-based, cross-site)	Affects almost all operational sites of FMTG, above all during the high season in summer or winter.	Own business activity	Particularly relevant in peripheral regions with a high shortage of skilled workers, including rural regions in Austria, Southern Italy and coastal regions of Croatia.	**Short term:** Intensification of international recruitment, use of personnel service providers. **Strategic:** Development of an FMTG employer profile, expansion of benefits and personnel development programmes. **Planned:** Introduction of a systematic talent management, cooperation with tourism schools, focus on year-round positions.	**Current status:** Measures in place selectively, not yet group-wide. **Measures:** HR strategy with a focus on recruitment, retention and employer branding in development. **Outlook:** Personnel development paths, cross-country recruiting campaigns and institutionalised cooperation with training institutions planned.	• Increased personnel costs due to overtime • Higher turnover costs due to repeated onboarding and induction
Losses of attractiveness and departures due to poor working conditions	Inadequate working conditions – for example irregular working hours, limited work-life balance, low remuneration or a lack of co-determination opportunities – can undermine employer attractiveness in the long term. In addition, the quality and availability of staff accommodation as well as adequate catering affect turnover rates and competitiveness in staff recruitment.	Working conditions	Risk as a result of company-internal factors (work-organisational, structural)	Affected are above all employees in operational service (housekeeping, kitchen, service), but also in the service companies.	Own business activity	Particularly pronounced in all core regions with seasonal operations.	**Short term:** Benefits such as free catering, wellness use or mobility offerings at individual sites. **Strategic:** Establishment of a personnel development strategy with a focus on appreciation, participation and further development. **Planned:** Introduction of feedback systems, leadership development, cross-site HR standards.	**Current status:** Employee surveys in place as a feedback instrument. **Measures:** First investments in employee satisfaction, new HR roles and communication initiatives being implemented. **Outlook:** Programmes to increase employer attractiveness planned (e.g. awards, career models, working-time innovations).	• Increased turnover costs (exit interviews, replacement, training costs) • Lower service quality at peak times due to staff shortages • Losses of image on employer review platforms and among applicants

Fig. 31 – Material risks ESRS S1

FMTG meets the challenges of the tourism industry with the aspiration of offering its employees stability, development and well-being.

SUPPLEMENTARY DISCLOSURE REQUIREMENTS

[ESRS S1-SBM-3.14]

The following information relates to the full group of workers affected by the material social impacts and risks of FMTG within the meaning of ESRS S1 Own Workforce. All information presented here relates to employees directly employed by FMTG.

A) TYPES OF EMPLOYEES AFFECTED

The material impacts and risks primarily affect directly employed staff – particularly in the operational areas of hotel and camping operations. This includes both permanent and seasonal employment relationships. Self-employed persons are only involved in exceptional cases – for example as external trainers or interim consultants – and are currently not materially affected.

B) SYSTEMIC OR CONTEXT-SPECIFIC NEGATIVE IMPACTS

The central negative impacts – in particular the limited availability of qualified employees as well as demanding conditions in operational hotel and tourism operations, such as shift work, seasonal work peaks or limited work-life balance – are not attributable to individual sites or isolated events. Rather, they reflect structural challenges of the European tourism and accommodation industry.

Particularly affected are sites with pronounced seasonality, structurally weak regional labour markets or limited infrastructure connections. In these regions, staff recruitment, staff retention and long-term team stability can represent a particular challenge.

C) POSITIVE IMPACTS AND AFFECTED GROUPS

In addition to the challenges described, FMTG's business activity also generates positive social impacts on the own workforce. These mainly relate to two aspects:

Stability and security of employment

For recurring seasonal (non-)employees, in particular in Austria, South Tyrol and Croatia, FMTG offers reliable employment prospects over several years. Structured re-entry processes, early planning and longer-term employment relationships contribute to promoting social security and professional continuity in a strongly seasonally characterised industry.

Promotion of recovery and well-being

At FMTG's sites, employees benefit from additional offerings to promote regeneration, recovery and well-being. These include, among other things, employee rates for hotel stays, access to selected wellness and recreation facilities as well as dedicated areas at the workplaces that support retreat opportunities and individual break arrangements. These offerings contribute to health promotion, stress reduction and staff retention.

The positive effects concern both employees employed year-round or on a permanent basis and recurring seasonal workers with fixed-term employment relationships at FMTG's sites.

D) MATERIAL RISKS

In the course of the double materiality assessment, two central risks in particular were identified for the area of the own workforce:

Skilled labour shortage:

The structural shortage of qualified workers can have a negative effect on operational stability, service quality, operational performance and the medium- to long-term scalability of the business model.

Loss of attractiveness as an employer:

A possible risk consists of increased turnover or declining retention, in particular as a result of demanding working hours, remuneration perceived as insufficient, limited co-determination opportunities or a lack of development prospects.

Both risks are counterbalanced by strategic potential: FMTG sees substantial opportunities in the targeted increase of employer attractiveness, the further development of the corporate culture, the establishment of internal career models as well as stronger differentiation as a sustainable employer – both to secure the workforce and to improve the guest experience.

E) IMPACTS IN THE CONTEXT OF THE ECOLOGICAL TRANSITION

In the course of the transformation towards more environmentally and climate-friendly forms of operation – for example through energy-related refurbishments, digitalisation, more efficient building technology, new mobility solutions or more sustainable operational processes – no far-reaching restructuring or staff-reduction measures are currently to be expected.

Rather, new requirements for existing task profiles arise on a selective basis, in particular in the areas of building management, data processing, energy and resource management as well as sustainability steering. FMTG sees in this opportunities for targeted continuing training, the development of new role profiles and the strengthening of sustainability-related competences. At the same time, the ecological transition can contribute to further developing the employer image and increasing FMTG's attractiveness for existing and potential employees.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

POLICIES RELATED TO OWN WORKFORCE

[S1-1]

HR MANAGEMENT CONCEPTS

FMTG pursues a holistic personnel strategy that aims at an attractive, safe and inclusive working environment. Particular focus is placed on strengthening leadership skills, structured onboarding processes for new employees, increasing employee satisfaction and targeted competence development across all hierarchical levels.

To ensure effective and efficient HR management, emphasis is placed on a modern and standardised data foundation, transparent management of HR indicators, and the continuous development of standards, processes, and policies.

In addition, FMTG advocates fair career opportunities, the promotion of diversity and social dialogue as well as the creation of good working and living conditions. These principles form the basis for sustainable corporate development in line with the company's own values and serve the long-term retention and satisfaction of employees.

FMTG CODE OF CONDUCT

The group-wide Code of Conduct serves all employees in the business units of FMTG as a binding frame of reference for values-based action. Respect, appreciation, courage, openness and trust form the basis of daily cooperation. These principles have shaped FMTG's entrepreneurial action for many years and are firmly anchored in the corporate culture.

FMTG and all persons working in the company comply with the applicable laws, regulations and provisions. It is the duty of all employees to know the laws and regulations relevant to their activity. FMTG respects international human rights as set out in the Universal Declaration of Human Rights and the European Convention for the Protection of Human Rights and Fundamental Freedoms. It aligns its actions with the SDGs as well as ethical norms.

SPECIFIC POLICY

In addition, a specific policy related to own workforce is being developed, which is to be anchored in FMTG's future "Social Policy".

QUALITY GUIDELINES

FMTG's **Quality Guidelines (QG)** create a group-wide framework for service quality, operational standards and personnel development. They define how quality requirements are implemented, reviewed and further developed in everyday working life. In this way, they support not only a consistent guest experience but also clear roles, structured processes and the professional development of employees.

Implementation takes place via digital and operational quality tools such as Power BI, Revinate, Mystery Checks, Flexkeeping, Action Plans and Brand Standards. These instruments make guest feedback, service processes and improvement potential transparent and form the basis for targeted training, coaching and operational measures. Results are carried into the teams via General Managers (GM) and Heads of Department (HOD) and translated into concrete improvement measures.

A central component are the Brand Standards, which define group-wide and operation-specific requirements. These include Brand Service Standards (BSS) for service processes, Brand Product Standards (BPS) for group-wide product specifications, Brand Individual Standards (BIS) for operation-specific standards as well as Brand Minimum Requirements (BMR) for minimum requirements for infrastructure, products, offerings and services.

In the social area, the Quality Guidelines make a contribution to the competence development and retention of employees. Via on-the-job training (OJT), department-specific coaching, self-audits and structured feedback processes, standards are conveyed in a practical manner and anchored in everyday working life. Flexkeeping supports this as a learning, communication and workflow tool with onboarding materials, Brand Standards, checklists and reporting functions.

The People Development measures are consistently aligned with the Falkensteiner Brand Quality Standards and comprise, among others, Front Office & Reservation, Food & Beverage (F&B), Culinary, Housekeeping (HSK), Acquapura Spa, Animation & Entertainment (A&E) as well as Sport & Active. The aim is to strengthen professional and personal competences, to create role clarity and to sustainably ensure service quality.

The Quality Guidelines thus foster a group-wide culture of continuous improvement. They combine quality management with personnel development and contribute significantly to strengthening stable teams, uniform standards and operational excellence within FMTG.

PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

[S1-2]

The views of the own workforce were taken into account within the framework of the materiality assessment and are, in future, to be systematically incorporated into the further development of work-related measures and strategies. The aim is to identify possible impacts on employees at an early stage and to address them appropriately.

A) NATURE OF THE INVOLVEMENT

In the course of the 2024 materiality assessment, anonymised qualitative interviews were conducted with employees of the corporate headquarters. For employees at the hotel and camping sites, feedback was provided indirectly via the responsible managers – in particular General Managers, regional managers in the area of Operations as well as central staff units (e.g. HR or Quality & People Development). In addition, a group-wide employee survey takes place at least once a year.

B) PHASE AND FREQUENCY OF INVOLVEMENT

The involvement on ESG topics took place specifically within the framework of the 2024 materiality assessment and within the framework of the annual employee survey. Going forward, it is envisaged to take the views of employees into account regularly in the course of ESG strategy processes and personnel development measures – among other things through an anonymous survey on ecological and social aspects planned for 2026 as well as, in the medium term, the introduction of an internal ideas competition regarding sustainability efforts within the group.

C) RESPONSIBILITY WITHIN THE COMPANY

The operational responsibility for the involvement lies primarily in the area of Human Resources. The strategic anchoring takes place in coordination with the Operations area and the Executive Board of FMTG.

PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

[S1-3]

In the 2025 reporting year, a group-wide digital whistleblower platform was implemented at FMTG. This provides employees with a structured and easily accessible reporting channel through which actual or potential negative impacts on workers can be reported confidentially and – if desired – anonymously. This concerns in particular matters in connection with working conditions, discrimination, health protection, interpersonal conflicts or possible violations of applicable law or internal regulations.

In addition, there continues to be the possibility of addressing concerns directly to superior managers, the local or central Human Resources department (HR) or other responsible internal contact persons. The FMTG Code of Conduct obliges all employees to report actual or suspected violations of applicable law or internal rules. At the same time, the Code provides that whistleblowers are protected against disadvantage.

The reports received via the digital whistleblower platform are forwarded to the responsible internal bodies and examined while preserving confidentiality. Through the introduction of the digital reporting channel, the transparency and effectiveness of the existing structures were increased and a uniform, low-threshold access to the reporting of human-rights- or work-related concerns was created – in line with the Code of Conduct and the requirements of the EU Whistleblower Directive.

ACTIONS RELATED TO MATERIAL IMPACTS ON OWN WORKFORCE

[S1-4]

DERIVING MEASURES FROM THE MATERIALITY ASSESSMENT AND HR STRATEGY

The material impacts on the own workforce, together with the HR strategy, form the basis for targeted measures. The focus is on good working conditions, secure employment, adequate remuneration, social dialogue, health, recovery as well as continuing training and development opportunities.

RECOVERY, BENEFITS FOR EMPLOYEES AND WORK-LIFE BALANCE

The recovery of employees as well as work-life balance were identified as central topics. Via special staff rates, employees can experience FMTG's holiday offering themselves at attractive conditions in the hotel and camping operations.

CONTINUING TRAINING AND DEVELOPMENT

To promote competences and career prospects, FMTG relies on training courses, training and continuing-education offerings. These measures support the professional and personal development of employees and strengthen long-term prospects within the group.

TEAM CULTURE AND EXCHANGE

To strengthen cohesion, various formats such as team events, team days, Christmas parties, apprentice team days, exchange programmes and sports events are implemented. They foster cross-site exchange, identification with FMTG and an appreciative team culture.

HEALTH PROMOTION

Health-promoting measures are also part of the portfolio of measures. Depending on the site and local conditions, these include, among other things, supplementary insurance, vaccination offerings as well as further support services to promote health and well-being.

FURTHER DEVELOPMENT OF GOOD WORKING CONDITIONS

Topics such as good working conditions, secure employment, fair remuneration and social dialogue remain central starting points for the further development of existing measures. Against the background of dynamic growth, FMTG is working to further anchor group-wide values, standards and structures in all operations and markets.

TARGETS RELATED TO OWN WORKFORCE

[S1-5]

In order to offer all employees a positive, motivating, equal and safe working environment, the targets pursued must be both ambitious and realistic and be continuously developed further in a dynamic process.

For S1, the following targets were defined:

EMPLOYEES AND WORKING CONDITIONS				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Introduction of a holistic HR data management system for the entire FMTG AG	2027	↖	↖	↖
Holistic presentation of the most important HR KPIs in the sustainability statement, incl. qualitative HR targets	2025	↖	↖	↖
Completion of a management training by at least 80% of the middle and top management of the accommodation operations	2026	↖	↖	↖
Establishment of a uniform onboarding process for line staff	2027	↖	↖	
Increase in employee satisfaction within the framework of employee surveys (comparison/base year 2025)	2028	↖	↖	↖
Promotion of training and competence development for employees at all hierarchical levels & formulation of a quantitative hours target	2026	↖	↖	↖
Establishment of transparent & structured career development plans	2027	↖	↖	↖
Support for gender diversity as well as social dialogue	ongoing	↖	↖	↖
Further structuring of mission statements, guidelines & standards	ongoing	↖	↖	↖
Optimisation of staff accommodation in hotel & camping operations	ongoing	↖	↖	

Fig. 32 – Targets ESRS S1

METRICS

CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

[S1-6]

Total number of employees by headcount and breakdowns by gender and country, for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees:

TOTAL	2025	2024
female	1,238	1,205
male	1,190	1,135
diverse	0	0
not specified	0	0
Total number	2,428	2,340

AUSTRIA	2025	2024
female	494	438
male	462	393
Total	956	831

CROATIA	2025	2024
female	422	436
male	383	389
Total	805	825

ITALY	2025	2024
female	211	239
male	276	293
Total	487	532

Fig. 33 – Characteristics of the undertaking's employees

Number of employees by headcount with permanent employment contracts including breakdown by gender:

GENDER	2025	2024
female	572	662
male	509	692
Total	1,081	1,354

Number of employees by headcount with fixed-term employment contracts including breakdown by gender:

GENDER	2025	2024
female	666	543
male	681	443
Total	1,347	986

Total number of employees who left the undertaking during the reporting period:

	2025	2024
excl. multiple counts[1]	2,391	2,007
incl. multiple counts[2]	2,821	2,091

Employee turnover rate in the reporting period:[3]

	2025	2024
excl. multiple counts	62%	86%
incl. multiple counts	74%	89%

Comparison: Turnover rate of corporate employees:

	2025	2024
Turnover rate corporate employees	21%	13%

[1] Single count of employees despite > 1 departures
[2] > 1 departure by the same employee within the reporting period
[3] This comparatively high rate reflects seasonality rather than structural turnover.

95% collective bargaining coverage and comprehensive social protection – FMTG relies on reliable labour-law standards across all its sites.

CHARACTERISTICS OF NON-EMPLOYEES IN THE UNDERTAKING'S OWN WORKFORCE

[S1-7]

Not material for FMTG. (2024: identical.)

COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

[S1-8]

Coverage of all employees by collective agreements in %:

	2025	2024
	95%	81%

Total percentage of employees covered by a collective agreement or agreements in the EEA, for each country in which the undertaking has a significant number of employees, i.e. at least 50 employees by headcount, representing at least 10% of the total number of its employees:

COUNTRY	2025	2024
Austria	97%	98%
Croatia	89%	27%
Italy	100%	100%

Fig. 34 – Collective bargaining coverage and social dialogue

Percentage of the undertaking's own employees outside the EEA covered by collective agreements, broken down by region:

No relevance of the metric. (2024: 100%) – following the disposal of the Belgrade site.

Total percentage of employees covered by workers' representatives, with information at country level for each EEA country in which the undertaking has a significant number of employees:

COUNTRY	2025	2024
Total	4%	21%
Austria	0%	13%
Croatia	12%	49%
Italy	0%	0%

Existence of an agreement between the undertaking and its employees on representation by a European Works Council, a Societas Europaea (SE) Works Council or a Societas Cooperativa Europaea (SCE) Works Council:

Not material for FMTG. (2024: identical.)

DIVERSITY METRICS

[S1-9]

Gender distribution by number as well as percentage at the top management level:

	2025	2024
Number	1	1
Gender	male	male
in %	100%	100%

Distribution of employees by age group: under 30 years, 30 – 50 years, over 50 years:

	2025	IN %	2024	IN %
under 30	799	32.9%	801	34.2%
30 – 50	1,195	49.2%	1,134	48.5%
over 50	434	17.9%	405	17.3%
Total	2,428	100%	2,340	100%

Fig. 35 – Diversity metrics

ADEQUATE WAGES

[S1-10]

All employees receive adequate remuneration in line with the applicable reference values pursuant to ESRS S1 paragraph 69 points (a) and (b).

SOCIAL PROTECTION

[S1-11]

All employees are protected against loss of income due to the life events referred to in ESRS S1 paragraph 74, points (a) to (e).
(2024: identical.)

PERSONS WITH DISABILITIES

[S1-12]

Percentage of persons with disabilities among the employees

	2025	2024
	0.16%	0.17%

Fig. 36 – Persons with disabilities

TRAINING AND SKILLS DEVELOPMENT METRICS

[S1-13]

Through the Quality & People Development department, FMTG not only secures its brand standards and service quality but also continuously increases them. The systematic training concept was set up across hierarchies and ranges from general onboarding processes through to Leadership Expertise training. The programme comprises the following training strands in order to equip FMTG's employees with the necessary skills and competences:

- Onboarding Trail
- Youngstars for Future
- Departmental Trainings & Coaching on the Job
- Coaching & Training – Growing to Excellence
- Leadership Development Path
- Leadership Expertise

At FMTG, however, continuing training and competence development also comprises topics such as self-care, implemented through yoga offerings for employees, the annual FMTG team days and Ideathons – cross-divisional continuing-education and networking formats for managers of the Falkensteiner hotels. They foster professional exchange, inspire through external impetus and support the continuous further development of the operational area in the respective hotel.

The following metrics on initial and continuing training provided by Quality & People Development are presented for 2025 as follows:

	YOUNGSTAR-TRAININGS		LEADERSHIP-PATH- TRAININGS		ON-THE-JOB-TRAININGS & COACHING RALLYES & CAMPS		E-LEARNING	
	2025	2024	2025	2024	2025	2024	2025	2024
Number of trainings	6	5	11	9	–	–	–	–
Days	12	10	17	14	790	658	–	–
Participants	73	61	154	128	–	–	540	450
QPD hours	–	–			6,317	5,264	n/a	n/a
Participant hours	5,850	4,880	17,200	14,336	–	–	1,758	1,464

HEALTH AND SAFETY METRICS

[S1-14]

Percentage of persons in the undertaking's own workforce who are covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines:

Not material for FMTG. (2024: identical.)

Number of fatalities attributable to work-related injuries and ill health:

	2025	2024
Number	0	0

Number and rate of recordable work-related accidents:

	2025	2024
Number	31	29
Rate	insufficient data available	

Number of cases of recordable work-related ill health, subject to legal restrictions on the collection of data:

	2025	2024
Number	0	0

Number of lost days attributable to work-related injuries and fatalities resulting from work-related accidents, to work-related illnesses, and to fatalities resulting from illnesses:

	2025	2024
Days lost due to work-related injuries from work-related accidents	362	621
Days lost due to work-related fatalities from work-related accidents	0	0
Days lost due to work-related ill health	0	0
Days lost due to fatalities from work-related ill health	0	0

Fig. 37 – Health and safety metrics

WORK-LIFE BALANCE METRICS

[S1-15]

Percentage of employees entitled to take family-related leave:

All employees are entitled to take family-related leave on the basis of social-policy and/or collective-bargaining agreements. (2024: identical.)

In 2025, the gender pay gap at FMTG fell to 5.4% – a further step on the path towards equal pay regardless of gender.

REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

[S1-16]

Unadjusted gender pay gap in %:

2025	2024
5.38%	8.90%

Ratio of the annual total remuneration of the highest-paid individual to the median annual total remuneration for all employees, excluding the highest-paid individual:

2025	2024
13.80	15.69

Fig. 38 – Remuneration metrics

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

[S1-17]

Total number of incidents of discrimination, including harassment, reported in the reporting period:

	2025	2024
Number	0	0

Number of complaints filed through channels for the undertaking's own workforce to raise concerns (including grievance mechanisms):

	2025	2024
Number	4	not yet recorded

Total amount of fines, sanctions and compensation payments in connection with the incidents and complaints described above:

	2025	2024
EUR	0	0

Fig. 39 – Incidents, complaints and severe human rights impacts

Number of severe human rights incidents in connection with the undertaking's own workforce in the reporting period:

	2025	2024
Number	0	0

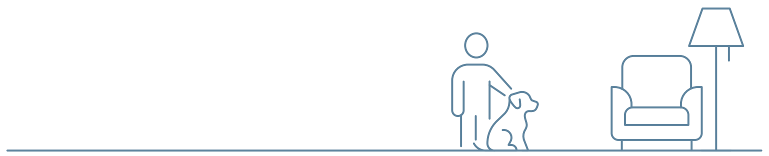
Total amount of fines, sanctions and compensation payments in connection with the incidents and complaints described above, as well as a reconciliation of the monetary amounts with the most relevant amount presented in the financial statements:

	2025	2024
EUR	0	0

CHANGES IN THE DATA BASIS AND DATA QUALITY COMPARED WITH THE PREVIOUS YEAR

Compared with the 2024 reporting period, certain adjustments arose relative to the previous year, owing to an improved data availability and the group-wide introduction of a new HR system for recording all relevant personnel data, but also owing to a correction in the underlying methodology for calculating the social metrics. In 2025, all personnel data from all sites of the respective countries were taken into account. The only exception is Serbia, as the former site in Belgrade has no longer been part of FMTG since 2025 and was therefore no longer taken into account.

For the current 2025 reporting period, a complete and consistent integration of all data as well as the basis for future comparability, taking into account all sites across countries, was thus ensured.



2. AFFECTED COMMUNITIES

[ESRS S3]

INTRODUCTION

Hotels, camping sites, and tourism development projects are always embedded in a broader social context. The business activities of FMTG directly or indirectly affect the quality of life, infrastructure, environmental perception, and social structures of the regions – particularly in rural areas with a strong focus on tourism.

Local anchoring, social participation, and the involvement of regional stakeholders are of strategic relevance for FMTG – both in terms of long-term acceptance and shared value creation.

CONNECTION TO OUR CORPORATE VALUES

Our actions in dealing with affected communities are guided by the core values of FMTG:

- **Driven for success:** We are aware of our social impact and aim to make it measurable and improve it through new formats of participation and cooperation in the region.
- **Grounded:** We respect local traditions and cultural characteristics and act with consideration for regional specificities.
- **Courageous:** We deliberately set impulses for sustainable regional development – through investments, cooperation, or social initiatives.
- **Relationship-oriented:** We cooperate with local businesses, authorities, associations, and educational institutions to jointly promote positive effects.

MATERIALITY OF THE TOPIC

The social aspect "Affected communities" was classified as material in the course of the double materiality assessment with regard to the impacts of FMTG's business activities on the local and neighbouring population.

In this chapter, the disclosures required by ESRS S3 in conjunction with ESRS 2 are presented. These include information on strategy as well as on material impacts and the underlying processes. In addition, disclosures are made on policies, actions and targets.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS S3 in conjunction with ESRS 2]

STRATEGY

INTERESTS AND VIEWS OF STAKEHOLDERS

[S3-SBM-2]

Reference may be made at this point to the relevant disclosures on S3-SBM-2 in the section General information – *9. Stakeholders*.

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[S3-SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS S3-SBM-3 on the material impacts in relation to affected communities as well as their interaction with strategy and the business model.

No material financial risks or opportunities were identified in this context. The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS S3 including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS S3 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Material impacts on affected communities

ESRS S3 – AFFECTED COMMUNITIES: MATERIAL IMPACTS							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
Decline in tourism acceptance in the affected community	Due to high guest frequency, growing operational density as well as infrastructural burdens (e.g. traffic volume, noise, land use), the societal acceptance of tourism use can decline in some regions. This affects in particular smaller or infrastructurally limited municipalities, in which tourism expansion is accompanied by usage conflicts (e.g. between the population and the tourism industry).	Entity-specific aspect	Actual negative impact	As a tourism developer and operator, FMTG is dependent on the approval of local actors. Site acceptance is a basic prerequisite for investments, operational stability and tourism growth. The long-term attractiveness of the sites depends significantly on a balanced relationship between tourism use and regional quality of life.	Own business activity (operation and development of tourism offerings), indirect interactions with municipal and societal actors.	**Short term:** Perceptible tensions in affected communities with a high burden from arrival and departure traffic or local infrastructure pressure. **Medium term:** Risk of increasing site criticism, participatory resistance or restrictions in project implementation. **Long term:** Declining societal legitimacy of tourism projects, potential approval obstacles and reputational losses.	Direct (via operational activities, external impact, space use) and indirect (through secondary tourism effects, guest flows, market positioning)
Price increases for everyday goods due to the region becoming more attractive and high guest volumes	In regions that are heavily frequented by tourism, increased demand – in particular seasonal – can give rise to an upward pressure on prices for everyday goods (e.g. food, housing, services). This particularly affects lower-income households and the local population without direct participation in tourism.	Economic, social and cultural rights of communities	Actual negative impact	The economic upgrading through tourism is part of FMTG's strategic positioning. At the same time, possible conflicts of objectives with the social needs of local households are acknowledged. A balanced relationship between the development of tourism demand and regional supply is central to responsible site responsibility.	Own business activity (site-related price effects), indirectly via market mechanisms (guest demand, regional marketing, second homes).	**Short term:** Increased tourism demand in the high season leads to price increases in the cost of living (e.g. housing, food, services). **Medium term:** Increased social differentiation and impairment of local interests due to a rising general price level. **Long term:** Structural increase in the cost of everyday goods, in particular in lower-income households.	Partly direct and indirect (via price pressure through tourism demand, rental and consumption behaviour, indirect land upgrading)
Reduction of available land for local housing and infrastructure	In regions that are heavily used for tourism, the pressure on available land for municipal housing, social infrastructure or local supply can increase due to construction, site development and land competition. This can lead to usage conflicts with municipalities and regional actors.	Economic, social and cultural rights of communities	Actual negative impact	FMTG invests in tourism infrastructure at sites with high demand potential, but generally not in areas or regions affected by "overtourism". In doing so, the limited availability of suitable land is increasingly taken into account as well. A coordinated land use in the sense of regional balance is an integral part of responsible project development.	Own business activity (development, land use, hotel and camping projects).	**Short term:** Land use through new construction projects can lead to usage conflicts with the local community. **Medium term:** Impeded availability of building land for municipal or social infrastructure. **Long term:** Restrictions in the development of regional structures (e.g. schools, care, housing).	Direct (via site planning, project implementation, space use)
Increase in value creation for people and businesses in the region	FMTG's tourism investments and business establishments can contribute to local value creation – for example through employment, supply chains, service relationships, tax payments or joint infrastructure projects. Regional companies and gainfully employed persons benefit from this.	Economic, social and cultural rights of communities	Actual positive impact	FMTG pursues the goal of involving regional partners and strengthening economic cycles on site. The economic participation of local actors contributes to the resilience, legitimation and social acceptance of the operations.	Own business activity (employment, purchasing), upstream value creation (local products, crafts, services), downstream effects (transport, retail, leisure industry).	**Short term:** Orders for local businesses through construction, renovation or other cooperation. **Medium term:** Establishment of regional supply chains, more stable employment and training opportunities. **Long term:** Regional establishment of business partnerships, continuous economic strengthening of the environment.	Direct (via operational decisions, supplier selection, local investments) and indirect (via demand effects, municipal levies, cluster formation)

Fig. 40 – Material impacts ESRS S3

Hospitality in practice does not end at the boundaries of our hotel and camping operations – it embraces the people and regions FMTG operations call home.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

POLICIES RELATED TO AFFECTED COMMUNITIES

[S3-1]

FMTG, through its group-wide Code of Conduct, is committed to a responsible and respectful approach towards local communities at all its locations. As part of its values-based self-conception, it strives to be a reliable and constructive partner that respects the characteristics of the respective regions, promotes social engagement, and makes a positive contribution to local development.

This approach shapes both the day-to-day operations of the hotels and campsites and the procedures for new planning and project developments. Active involvement of relevant stakeholders, the promotion of regional structures, and a sensitive approach to social and ecological conditions on site are central elements of its understanding of corporate responsibility.

On this basis, the policy on affected communities – which will be anchored in the future Social Policy – is continuously developed with the aim of aligning entrepreneurial action with the needs and expectations of people in the respective regions.

PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

[S3-2]

A systematic and group-wide standardised involvement of affected communities in decision-making processes to address actual or potential impacts does not currently exist. However, in location-related projects – particularly new constructions or major renovation works – the concerns of the surrounding population and relevant local stakeholders are taken into account on a case-by-case basis. This takes place through informal discussions, legally required procedures, or project-related feedback loops.

Involvement generally takes place in the early project phases during site development. Responsibility for coordinating with local stakeholders lies with project development, supported by the sustainability team and – depending on the project – regional (construction) management.

A formalised assessment of the effectiveness of this involvement is not yet implemented. However, insights from coordination are regularly incorporated into project design and operational planning.

PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS

[S3-3]

In the 2025 reporting year, there was no structured group-wide channel at FMTG through which affected communities could transmit concerns or complaints in a systematic form. The design and introduction of a corresponding reporting and complaint mechanism is envisaged in one of the following financial years, in order to strengthen the interaction with local communities and to be able to record and address potential negative impacts at an early stage.

ACTIONS AND TARGETS RELATED TO AFFECTED COMMUNITIES

[S3-4; S3-5]

LOCAL ANCHORING OF THE HOTEL AND CAMPING OPERATIONS

The hotel and camping operations regard themselves as part of local society and are also to be perceived as such. The operations and also guests benefit from the cultural and scenic offering of the regions in which FMTG operates its sites. In return, efforts are made to maximise all positive impacts on the local community and to mitigate the partly unavoidable negative impacts as far as possible.

CONSIDERATION IN THE PLANNING AND CONSTRUCTION OF NEW PROJECTS

In planning, and particularly during the construction phase of new projects, FMTG seeks to mitigate the temporarily increased burden on affected communities as much as possible. As already mentioned in ESRS E5 Resource Use and Circular Economy, FMTG aligns new projects with the criteria of the EU Taxonomy Regulation and established building certification systems for new projects, committing itself to implementing certain protective measures. FMTG therefore strives to ensure that all its construction sites are operated with as little dust, waste, and noise as possible. This minimises the impact not only on nature and the environment but also on local residents.

HANDLING OF POTENTIAL IMPACTS ON THE COST OF LIVING AND HOUSING

Another negative impact identified in the course of the materiality assessment is the potential increase in the prices of everyday goods, including housing costs, resulting from the overall attractiveness of the region and the associated increase in demand. FMTG develops and operates hotel properties, campsites, and holiday apartments that are designated for commercial purposes. Therefore, no residential housing is withdrawn from the market through temporary (short-term) rentals.

RELIEF OF LOCAL SUPPLY STRUCTURES THROUGH INTEGRATED GUEST OFFERINGS

Furthermore, FMTG offers a comprehensive food & beverage (F&B) offering in its accommodation operations, so that guests have access to a wide range of culinary services throughout their stay and can thus forgo self-catering.

PROMOTION OF REGIONAL VALUE CREATION AND LOCAL OFFERINGS

Tourism operations generally also contribute to strengthening local value creation, as the region as a whole becomes more attractive and adjacent businesses from different sectors can benefit from the increased frequency of FMTG guests. In addition, FMTG actively seeks to integrate local businesses, natural areas, and other attractions into its offering. Temporary pop-up markets and art exhibitions held in hotel premises, for example, serve as exhibition spaces and help increase the reach of local producers and artists.

ISSUES AND INCIDENTS IN CONNECTION WITH HUMAN RIGHTS

In the reporting period, no severe issues and incidents in connection with human rights relating to affected communities were reported.

TARGETS FOR STRENGTHENING LOCAL COMMUNITIES

In addition to the measures already established, FMTG has defined a set of targets in its ESG strategy with which positive impacts on local communities are to be strengthened and potential negative impacts are to be reduced proactively. The following overview presents the objectives, target years and the respective areas of application:

LOCAL COMMUNITIES				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Strengthen networking with the local community (focus hotel and camping operations)	ongoing	✓	✓	✓
Establish cooperation with non-profit organisations at hotel & camping operation level as well as at FMTG AG level	2026	✓	✓	✓
Increasing the share of organic products as well as regional products (food) to the standard of the Austrian Ecolabel at all hotel & camping operations (where available and economically viable)	2028	✓	✓	
Minimisation of the burden on the local population in new projects through active stakeholder involvement	ongoing	✓	✓	
Continuous increase in the share of local workers in hotel & camping operations	ongoing	✓	✓	

Fig. 41 – Targets ESRS S3

METRICS

The ESRS S3 standard does not contain any specific requirements for the disclosure of metrics related to affected communities. In addition, no relevant company-specific metrics were identified.

3. CONSUMERS AND END-USERS

[ESRS S4]

INTRODUCTION

As a provider of high-quality holiday experiences, FMTG places the needs, rights, and trust of its guests at the centre of its actions. In upscale leisure hospitality, guest orientation means far more than comfort, service, and experience – it also includes responsibility for health, safety, data protection, transparency, and sustainability.

For FMTG, this means designing an experience offering that meets the highest quality standards while also being responsible and forward-looking. Guests are regarded as partners in a shared responsibility for sustainable tourism – with the aim of fostering conscious decisions and ensuring long-term satisfaction.

CONNECTION TO OUR CORPORATE VALUES

Our values are also reflected in our interactions with guests and the design of our offerings:

- **Driven for success:** We continuously develop offerings that meet the highest quality standards while being ecologically and socially responsible.
- **Grounded:** We communicate honestly and provide clear information to our guests.
- **Courageous:** We promote sustainable choices by our guests – through environmentally friendly initiatives, resource-saving services, and transparent information.
- **Relationship-oriented:** We build on trust and authentic hospitality as the basis for long-term customer loyalty.

MATERIALITY OF THE TOPIC

As part of the double materiality assessment, “consumers and end-users” was classified as material – both regarding the impacts of FMTG’s business activities on its guests and with respect to potential risks.

Accordingly, this chapter discloses the information required under ESRS S4 in conjunction with ESRS 2. These include disclosures on strategy, material impacts, risks, and the underlying processes relating to consumers and end-users. In addition, disclosures on policies, actions and targets are provided.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS S4 in conjunction with ESRS 2]

STRATEGY

INTERESTS AND VIEWS OF STAKEHOLDERS

[S4-SBM-2]

Reference may be made at this point to the relevant disclosures on S4-SBM-2 in the section *General information – 9. Stakeholders.*

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[S4-SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS S4-SBM-3 on the material impacts and risks relating to consumers and end-users, as well as their interaction with the strategy and business model. No material financial opportunities were identified in this context.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS S4 including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS S4 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

Material impacts on consumers and end-users

ESRS S4 – CONSUMERS AND END-USERS: MATERIAL IMPACT							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
Contribution to the well-being and health-promoting experience of guests	FMTG's hotel and camping operations promote the physical and mental well-being of guests through near-natural locations, high-quality infrastructure as well as targeted offerings for recovery, exercise and nutrition. The stay contributes to relaxation, stress reduction and mental balance and corresponds to the growing need for health-promoting recreational spaces.	Entity-specific aspect	Actual positive impact	The promotion of guests' well-being is a central component of FMTG's performance promise. It is firmly anchored in the positioning as a provider of upscale family resort hotels with high comfort and recreation aspirations. Health-promoting conditions – from exercise and relaxation opportunities through to balanced nutrition – feed in a targeted manner into the design of the offering.	Own business activity	**Short term:** Direct recovery and health impetus during the stay. **Medium term:** Increase in guest satisfaction, customer loyalty and contribution to preventive health promotion. **Long term:** Reputational advantages through consistent alignment with health- and recovery-promoting offerings.	Direct (through the design of the operational offering and relevant infrastructure, services, nutrition offering, etc.)

Fig. 42 – Material impacts ESRS S4

Material risks related to consumers and end-users

ESRS S4 – CONSUMERS AND END-USERS: MATERIAL RISK									
NAME OF THE RISK OR OPPORTUNITY	DESCRIPTION OF THE RISK OR OPPORTUNITY	SUB-TOPIC	TYPE OF RISK	LOCATION IN THE BUSINESS MODEL AND IN THE VALUE CHAIN			INFLUENCE ON STRATEGY, BUSINESS MODEL AND DECISION-MAKING	RESILIENCE OF STRATEGY AND BUSINESS MODEL	CURRENT FINANCIAL EFFECTS ON FINANCIAL POSITION, FINANCIAL PERFORMANCE AND CASH FLOWS
				OPERATIONAL RELEVANCE	POSITION IN THE VALUE CHAIN	GEOGRAPHICAL CONCENTRATION			
Risk of financial damage and reputational losses as a result of data protection breaches	The processing of personal guest data – within the framework of bookings, CRM, marketing and digital services – is subject to strict data protection requirements (in particular the GDPR). Insufficient security precautions or faulty processing can lead to data protection breaches and trigger considerable financial risks (fines, lawsuits) as well as reputational damage.	Information-related impacts for consumers and/or end-users	Financial risk due to regulatory non-compliance, potential penalty payments as well as revenue-relevant losses of trust	Affects central systems in the area of marketing, guest booking, CRM, IT infrastructure.	Own business activity, in particular digital interfaces to end-users	Relevance in all markets with active guest-data processing (above all the EU area with GDPR)	**Short term:** Implementation of technical and organisational data protection measures, staff training, adaptation of forms and consents. **Strategic:** Establishment of a group-wide harmonised data protection management system, integration into the internal control system (ICS) and Digital Strategy. **Planned:** Automated deletion processes, data protection impact assessments for new tools, systematic review of external service providers.	**Current status:** Data protection requirements are taken into account in principle; central standards, however, still under development. **Measures:** Establishment of uniform data protection processes, training measures, commissioning of external data protection experts. **Outlook:** Data protection is to become an integral part of the digital brand positioning; continuous improvement of the protection of sensitive customer data planned.	• Costs for IT staff, software and internal training • Image and trust risks with a potential influence on guest behaviour (e.g. reticence towards digital services)

Fig. 43 – Material risks ESRS S4

FMTG's guests are partners in a holiday experience built on mutual trust, safety and honest communication.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

POLICIES RELATED TO CONSUMERS AND END-USERS

[S4-1]

FMTG is committed to responsible, transparent, and respectful interaction with its guests – one of the company's key stakeholder groups. The group-wide Code of Conduct forms the binding basis for dealings with consumers and end-users across all business units.

The aim is to provide guests with a high-quality, safe, and fair offering at all times. Central to this are the protection of consumer rights, data protection, health and safety, as well as clear and transparent communication. FMTG is committed to ensuring that information on its services is understandable, complete, and transparent.

In handling complaints, feedback, and suggestions for improvement, FMTG pursues a solution-oriented, service-driven approach that enables the continuous enhancement of the guest experience. The satisfaction and trust of end-users are at the core of the quality strategy.

A specific policy on consumers and end-users is currently being developed, which is to be anchored in FMTG's future "Social Policy".

In addition, the group attaches great importance to protecting particularly sensitive guest groups – such as families, children, or people with disabilities. This is reflected in accessible facilities, child-friendly services, and compliance with safety standards in leisure activities.

Through continuous training, group-wide standards, and responsible market conduct, FMTG ensures that the expectations and needs of its guests are not only respected but also actively integrated into the further development of services. These principles are implemented across the group and are subject to regular review.

PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

[S4-2]

The targeted involvement of hotel and camping guests – as the core group of consumers and end-users – in corporate decision-making to address actual or potential impacts is not yet carried out within formalised procedures. Instead, the assessment of relevant issues is based on a combination of internal analyses, continuous guest feedback, selected individual interviews, as well as consideration of regulatory requirements and industry standards.

In day-to-day operations, feedback from guest surveys, reviews, or personal interactions is regularly documented and, where necessary, integrated into the further development of services, processes, or communication measures. Responsibility for processing and integrating this feedback lies with the individual establishments and the central Quality & People Development team.

Looking ahead, FMTG plans to expand structured feedback formats on ESG topics, to integrate guest perspectives more strongly and purposefully into strategic deliberations.

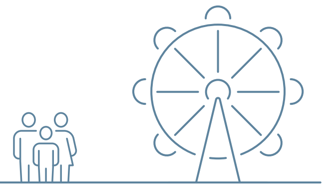
PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

[S4-3]

In the 2025 reporting year, there was not yet a group-wide structured process at FMTG for recording and addressing possible negative impacts on consumers and end-users.

Existing feedback options – for example in the form of guest surveys or contact forms – have so far been the responsibility of the respective operations or the operational hotel management. A systematic recording and evaluation of such feedback with regard to human-rights- or sustainability-related impacts has so far not yet taken place.

With a view to the following reporting periods, the introduction of a standardised, group-wide reporting and complaint mechanism is planned, which is intended to enable guests, consumers and other affected end-users to communicate concerns regarding certain negative experiences in a structured manner. The aim is to strengthen transparency and effectiveness within the framework of the interaction with all guests.



ACTIONS AND TARGETS RELATED TO CONSUMERS AND END-USERS

[S4-4; S4-5]

CONTRIBUTION TO RECOVERY, WELL-BEING AND HEALTH OF GUESTS

Through the diverse holiday experience, which comprises culinary, active and wellness-oriented offerings, FMTG makes a contribution to the recovery, well-being and health-promoting experience of its guests. This positive impact was also classified as relevant by several stakeholder groups within the framework of the materiality assessment. Through the ongoing conversion and expansion of existing sites as well as FMTG's expansion strategy, this effect is to be further strengthened and extended to additional guest groups.

ENSURING QUALITY AND THE GUEST EXPERIENCE

Ensuring a high-quality and consistent guest experience is a central component of FMTG's business model. To safeguard the group-wide quality standards as well as to promote the professional and social competence of the employees in the hotel and camping operations, the Quality & People Development team supports the continuous further development of training and continuing-education formats. Through this, service quality, guest safety and the professional care of guests are to be continuously improved.

PROTECTION OF PERSONAL DATA AND CONFIDENTIALITY

FMTG is aware of the high importance of confidentiality and data protection. It therefore undertakes to protect the personal data and confidential information of all stakeholders – in particular its guests – as effectively as possible. According to the group-wide FMTG Code of Conduct, all employees are obliged to comply with the applicable legal requirements for the protection of personal data. In addition, FMTG takes appropriate organisational and technical measures in order to ensure a secure and confidential processing and storage of sensitive information.

TARGETS RELATED TO CONSUMERS AND END-USERS

To promote positive impacts and to minimise potential risks, FMTG has set itself the following targets. At the centre are in particular the following topic areas:

CONSUMERS AND END-USERS (GUESTS)				
TARGET	TARGET YEAR	HOTELS	CAMPING	CORPORATE
Positive influencing of guest behaviour through communication & involvement in sustainability initiatives in all hotel & camping operations	ongoing	↖	↖	
Communication of the ESG strategy (targets & measures) to guests in all hotel & camping operations	ongoing	↖	↖	
Ensuring transparent & fact-based ESG communication towards the guests (edutainment)	ongoing	↖	↖	
First-time collection of the KPI “health promotion & recovery” with subsequent formulation of a quantitative target for following years	2026	↖	↖	↖

Fig. 44 – Targets ESRS S4

METRICS

The ESRS S4 standard does not contain any concrete requirements for the disclosure of metrics related to consumers and end-users.
In addition, no relevant company-specific metrics were identified.

4 GOVERNANCE INFORMATION

BUSINESS CONDUCT

[ESRS G1]

INTRODUCTION

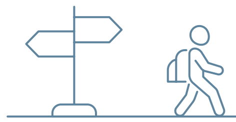
Responsible, transparent, and integrity-based corporate governance (“Good Governance”) is a prerequisite for long-term value creation, regulatory compliance, and stakeholder trust. ESRS G1 - Business Conduct requires disclosures on steering mechanisms, corporate culture, supplier relationships, anti-corruption measures, political influence, and payment practices.

For FMTG, responsible corporate governance is of essential importance in the context of its international business activities – in ongoing hotel and camping operations, in project development and in strategic investment for future expansions. Responsible corporate governance is regarded as a prerequisite for sustainable growth, trust, and resilience, while at the same time being the basis for effective management of sustainability topics.

CONNECTION TO OUR CORPORATE VALUES

Our understanding of good governance is closely linked to FMTG’s values:

- **Driven for success:** We commit ourselves to the highest integrity standards and establish our governance structures based on efficiency, effectiveness, and future viability.
- **Grounded:** We consistently comply with legal and ethical requirements – in all countries and regions in which we operate.
- **Courageous:** We further develop our steering and control processes and use modern, digital solutions for transparency and traceability.
- **Relationship-oriented:** We cultivate an open, dialogue-oriented corporate culture and foster responsibility at all levels – in contact with employees, business partners, and owners.



For FMTG, good corporate governance is the foundation on which sustainable growth, trust and long-term success can emerge in the first place.

MATERIALITY OF THE TOPIC

Business Conduct was classified as material in the double materiality assessment with regard to its (potential) impact.

This chapter therefore discloses the information required under ESRS G1 in conjunction with ESRS 2. These include information on governance, strategy, material impacts, and the underlying processes in relation to governance. In addition, disclosures are provided on policies, actions and targets.

TOPIC-SPECIFIC DISCLOSURE REQUIREMENTS

[ESRS G1 in conjunction with ESRS 2]

GOVERNANCE

THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

[G1-GOV-1]

Reference may be made at this point to the relevant disclosures on G1-GOV-1 in the section *General information – 6. Governance.*

STRATEGY

MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

[ESRS 2 SBM-3]

FMTG reports according to ESRS 2 SBM-3 in conjunction with ESRS G1-SBM-3 on its material impacts in relation to corporate governance and their interaction with the strategy and business model. No material financial risks or opportunities were identified in relation to governance.

The reporting is based on the specific requirements of ESRS 2 and the topic-specific requirements of ESRS G1, including Application Requirements (AR) pursuant to Appendix A.

FMTG makes use of the option to provide the disclosures pursuant to ESRS 2 paragraph 46 on SBM-3 in this topical ESRS G1 (cf. ESRS 2 paragraph 49).

MATERIAL IMPACTS RELATED TO BUSINESS CONDUCT

ESRS G1 – BUSINESS CONDUCT: MATERIAL IMPACT							
NAME OF THE IMPACT	DESCRIPTION OF THE IMPACT	SUB-TOPIC	TYPE OF IMPACT	CONNECTION TO STRATEGY AND BUSINESS MODEL	CLASSIFICATION IN THE VALUE CHAIN	TIME HORIZONS	FORM OF RESPONSIBILITY
Improved corporate culture	A lived, values-oriented corporate culture – supported by ethical guidelines, transparent processes and responsible leadership (good governance) – strengthens the trust of employees, promotes identification with the company and has a positive effect on the working atmosphere, loyalty and commitment of the workforce.	Corporate culture	Potential positive impact	FMTG pursues a values-based understanding of leadership and systematically anchors integrity, transparency and responsibility in decision-making processes. A strong corporate culture is regarded as a strategic success factor in a competitive labour-market environment.	Own business activity	**Short term:** Improved mood among employees, positive feedback in feedback formats, higher participation in internal initiatives. **Medium term:** Improved internal cooperation, declining turnover, more stable teams. **Long term:** Increased resilience to external challenges and sustainable anchoring of ESG principles in everyday working life.	Direct

Fig. 45 – Material impacts ESRS G1

Clear values, transparent processes, responsible leadership: building blocks FMTG works on continuously.

Integrity is not created on paper, but in day-to-day action – the FMTG Code of Conduct combines clear rules with lived values.

MANAGEMENT OF IMPACTS, RISKS AND OPPORTUNITIES

DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

[G1-IRO-1]

Reference may be made at this point to the disclosures on ESRS 2 IRO-1 in conjunction with ESRS G1-IRO-1 in the section *General information – 10. FMTG's material sustainability topics.*

BUSINESS CONDUCT POLICIES AND CORPORATE CULTURE

[G1-1]

CODE OF CONDUCT AS THE BASIS OF INTEGRITY IN BUSINESS CONDUCT

FMTG has anchored its principles for integrity in business conduct and ethically correct behaviour in a group-wide Code of Conduct. The Code of Conduct is aimed at all employees, managers as well as business partners and lays down binding guidelines for lawful, responsible and values-based action.

The Code of Conduct forms the central basis for FMTG's responsible business conduct. In addition, the governance structure already established in the 2024 reporting year supports the systematic integration of sustainability aspects into the operational business and contributes to the further anchoring of good-governance principles within the group.

CORPORATE CULTURE AND UNDERSTANDING OF VALUES

FMTG's corporate culture is based on central principles such as responsibility, efficiency, enthusiasm, authenticity and warmth. These values are set out in the Code of Conduct and form the frame of reference for daily interaction within the corporate group.

The Code defines fundamental behavioural requirements, refers to international standards and formulates clear expectations of a respectful, fair and professional treatment of colleagues, customers and business partners. Information on systematic assessment mechanisms or impact analyses of the corporate culture is not currently a component of the Code of Conduct.

REPORTING MECHANISMS FOR POSSIBLE VIOLATIONS

The Code of Conduct provides that employees report possible violations of legal requirements, internal guidelines or ethical principles. In 2025, FMTG introduced a group-wide digital whistleblower platform. This is available to all employees and enables an uncomplicated, confidential and anonymous reporting of possible violations of the Code of Conduct or applicable law.

The reports are forwarded to an independent internal body and examined there while preserving confidentiality. In doing so, it is ensured that whistleblowers are effectively protected against reprisals or retaliatory measures. See also above under disclosure requirement S1-3 in the chapter "Social information". A more far-reaching formalised process for involving external stakeholders in whistleblowing procedures is not currently envisaged.

CORRUPTION PREVENTION

FMTG is committed to acting with integrity and in compliance with the law and expressly rejects any form of corruption, bribery as well as the unlawful granting of advantages. This fundamental attitude is bindingly anchored in the group-wide Code of Conduct.

The Code contains clear rules on avoiding corruption, the acceptance of advantages and the granting of advantages. Employees are urged to refuse inappropriate benefits and to avoid even the appearance of impermissible influence. In the event of uncertainties or indications of possible violations, defined reporting channels, in particular the digital whistleblower channel, are available.

PROTECTION OF WHISTLEBLOWERS

Employees who provide information in good faith are protected against disadvantage, reprisals or disciplinary consequences. The protection of whistleblowers takes place in line with the requirements of the EU Whistleblower Directive as well as the Austrian Whistleblower Protection Act (HinweisgeberInnenschutzgesetz, HSchG).

EXAMINATION OF REPORTS AND INTERNAL INVESTIGATIONS

The examination of reports received takes place through the responsible internal body while preserving independence, objectivity and confidentiality. The Code of Conduct provides that possible violations are appropriately investigated and, in the case of confirmed violations, corresponding consequences are initiated.

TRAINING AND AWARENESS-RAISING ON GOVERNANCE TOPICS

A comprehensive group-wide training concept on governance, ethics and integrity is not yet fully established. FMTG, however, is working on the development of a group-wide training concept in order to raise employees' awareness in future even more specifically of governance topics, rule-compliant behaviour and integrity requirements.

PERSONS PARTICULARLY EXPOSED TO RISK

The Code of Conduct does not currently name any specific functions or organisational areas with an increased corruption risk. From FMTG's point of view, however, those employees in particular can be exposed to an increased risk of exposure who have direct decision-making or participation powers in contracts, procurement processes, the awarding of contracts or financial decisions. This concerns in particular all functions with an influence on supplier selection and purchasing.

FURTHER DEVELOPMENT OF THE GOVERNANCE STRUCTURES

To further strengthen internal steering and control mechanisms in the area of governance, FMTG relies on the targeted integration of international standards and recognised certification systems.

In the development of new hotel and camping projects, sustainability criteria are taken into account at an early stage. The basis for this is formed in particular by external assessment standards such as the criteria of the EU Taxonomy Regulation as well as international building certification standards.

In ongoing operations, recognised ecolabels, in particular the Austrian Ecolabel and the EU Ecolabel, are to be further expanded. Through this, ecological standards are to be externally validated and the environment-related performance of the operations systematically assessed.

OUTLOOK: ESTABLISHMENT OF ESG RISK MANAGEMENT

For a well-founded and responsible management across all business areas, FMTG pursues the goal of introducing group-wide ESG risk management in the coming reporting periods. The aim is the systematic identification, assessment and steering of material risks from the areas of environment, social and governance, including their interactions with strategic objectives and decision-making processes. The insights gained from this are to be shared on an ad-hoc basis with the relevant decision-makers within the group and integrated into existing steering processes. The planned ESG risk management thus forms an important basis for strengthening the resilience of the business model as well as preparing for regulatory and market-driven changes in the ESG context.

MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

[G1-2]

APPROACH TO SUPPLIER MANAGEMENT

FMTG procures a wide range of goods and services for its hotel, camping and development operations from national and international procurement markets. Collaboration with suppliers takes place predominantly within the framework of established business relationships on the basis of standardised contractual agreements.

FMTG's supplier management is guided by criteria such as reliability, quality, delivery capability and price stability. Within the framework of selection and award decisions, industry-specific risks – for example with regard to supply security, price sensitivity or market structure – are also taken into account. Sustainability aspects along the supply chain are becoming increasingly important, but have so far not been systematically anchored. A structured assessment of potential negative impacts of suppliers on environmental or social concerns has so far not taken place comprehensively.

CONSIDERATION OF SOCIAL AND ECOLOGICAL CRITERIA

In certain procurement areas – such as regional food products, ecological building materials, or cleaning agents – social and ecological criteria are already taken into account. However, a group-wide policy with a focus on sustainability aspects for supplier selection does not currently exist. Stronger consideration of sustainability-related requirements is planned in the future.

POLICY TO PREVENT LATE PAYMENTS

A specific policy to prevent late payments for suppliers – particularly to small and medium-sized enterprises – does not currently exist. Payments are generally made on the basis of agreed terms and payment deadlines. Differentiation by company size of supplier partners is not yet provided for the payment process.

PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

[G1-3]

FMTG is committed to acting with integrity and in compliance with the law and expressly rejects any form of corruption, bribery as well as the unlawful granting of advantages. This fundamental attitude is bindingly anchored in the group-wide Code of Conduct and applies to all employees as well as business partners. The Code of Conduct defines clear rules of conduct for dealing with benefits and obliges the avoidance of even the appearance of impermissible influence. In the event of uncertainties or indications of possible violations, defined reporting channels, in particular the established whistleblower channel, are available to employees.

Currently no separate anti-corruption programme or structured corruption and bribery risk assessments exist. Internal training on these topics has so far not taken place in a standardised manner. The further development of the compliance structures takes place on an ongoing basis.

The reporting and protection mechanisms for whistleblowers relevant in connection with this disclosure requirement as well as the introduction of a group-wide digital whistleblower platform have already been described in detail above within the framework of the disclosures on G1-1.

METRICS

INCIDENTS OF CORRUPTION OR BRIBERY

[G1-4]

In the 2025 reporting year, no confirmed incidents of corruption or bribery were identified at FMTG. No internal investigations were initiated on account of corresponding allegations and no legal proceedings in connection with such violations are pending. (2024: identical.)

POLITICAL INFLUENCE AND LOBBYING ACTIVITIES

[G1-5]

FMTG does not engage in lobbying activities and does not make political donations. As the sub-topic is not applicable to FMTG's business activities, no further information is disclosed under G1-5.

PAYMENT PRACTICES

[G1-6]

Payments to suppliers are made in accordance with the contractually agreed terms. FMTG does not apply payment terms that differentiate by company size, and no legal proceedings for late payment were outstanding in the reporting period.

No further information is disclosed, as no material impacts, risks or opportunities were identified.

ENTITY-SPECIFIC DISCLOSURE: NUMBER OF CERTIFIED OPERATIONS

FMTG works continuously to increase the number of hotel and camping operations that have been awarded an external sustainability certificate. The following operations held the following certifications at the end of 2025:

HOTEL OR CAMPING OPERATION	COUNTRY	EU ECOLABEL	AUSTRIAN ECOLABEL
Falkensteiner Schlosshotel Velden	Austria	✓	✓
Falkensteiner Hotel & Spa Carinzia	Austria	✓	✓
Falkensteiner Club Funimation Katschberg	Austria	✓	✓
Falkensteiner Hotel Cristallo	Austria	✓	✓
Falkensteiner Hotel Sonnenalpe	Austria	✓	✓
Falkensteiner Hotel Bad Leonfelden	Austria	✓	✓
Falkensteiner Hotel Schladming	Austria	✓	✓
Falkensteiner Balance Resort Stegersbach	Austria	✓	✓
Falkensteiner Hotel Montafon	Austria	✓	✓
Falkensteiner Hotel & Spa Iadera (Resort Punta Skala)	Croatia	✓	
Falkensteiner Hotel Diadora (Resort Punta Skala)	Croatia	✓	
Falkensteiner Camping Grubhof	Austria	✓	

Fig. 46 – Number of certified operations

OUTLOOK

FMTG continues its sustainability journey with conviction – confident that responsible action and economic success belong together in the long term.

The sustainability journey continues

FMTG consistently continues its sustainability journey – with the aspiration of bringing continuous growth and sustainable development into a long-term balance. This is not about short-term measures, but about a steady, structural further development that is anchored in the operational processes of the group's hotels and camping sites.

Operational excellence meets responsibility

In operations, environmental and social topics are at the centre: Sustainable practices are continuously integrated into daily processes and further developed together with the growth of the group. At the corporate level, governance topics supplement this framework and create the structural prerequisites for a holistic ESG management.

Sustainability as a shared task

FMTG's management clearly stands behind the topic of sustainability and drives it forward consistently. Because ESG and sustainability are not tasks of individual departments but a group-wide concern – and a sustainable transformation only truly succeeds if everyone helps to shape it. FMTG is convinced: sustainability only works if all employees – from the company management to the operational level – are involved, understand the background and have the opportunity to actively contribute. The aim is to develop a shared attitude in which each and every individual knows their own contribution and understands why it counts.

Sustainability as an attitude – not as an obligation

FMTG will continue to prepare its sustainability reporting according to CSRD and ESRS in future – and does so deliberately, even though changed reporting obligations no longer strictly require this. The group does not understand sustainability as a regulatory requirement but as a responsibility towards the environment, guests, employees as well as society as a whole.

Resilience through forward-looking action

At the same time, FMTG pursues the aspiration of combining sustainability with economic viability. Through forward-looking action and a consistent implementation of the group-wide sustainability strategy, the resilience of the business model is to be strengthened in the long term. The defined targets are pursued holistically – with the aspiration of achieving measurable progress year after year.

The Corporate Carbon Footprint as a strategic steering instrument

The group-wide Corporate Carbon Footprint (CCF) remains a central tool in this – not only as a means of external communication, but also as a strategic lever to focus on the most effective levers, to address emission drivers in a targeted manner and to consistently continue on the path to an ambitious yet realistic reduction strategy.

APPENDIX

LIST OF DATAPOINTS IN CROSS-CUTTING AND TOPICAL STANDARDS THAT DERIVE FROM OTHER EU LEGISLATION

ESRS DISCLOSURE REQUIREMENT	ASSOCIATED DATAPOINT		SFDR REFERENCE (1)	PILLAR 3 REFERENCE (2)	BENCHMARK REGULATION REFERENCE (3)	EU CLIMATE LAW REFERENCE (4)	REFERENCE / LOCATION
ESRS 2 GOV-1	21d	Board's gender diversity	x		x		p. 24
ESRS 2 GOV-1	21e	Percentage of board members who are independent			x		p. 24
ESRS 2 GOV-4	30	Statement on due diligence	x				p. 30
ESRS 2 SBM-1	40d (i)	Involvement in activities related to fossil fuel activities	x	x	x		Not material
ESRS 2 SBM-1	40d (ii)	Involvement in activities related to chemical production	x		x		Not material
ESRS 2 SBM-1	40d (iii)	Involvement in activities related to controversial weapons	x		x		Not material
ESRS 2 SBM-1	40d (iv)	Involvement in activities related to cultivation and production of tobacco			x		Not material
ESRS E1-1	14	Transition plan to reach climate neutrality by 2050				x	p. 65
ESRS E1-1	16g	Undertakings excluded from Paris-aligned Benchmarks		x	x		Not material
ESRS E1-4	34	GHG emission reduction targets	x	x	x		p. 71
ESRS E1-5	38	Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors)	x				p. 74
ESRS E1-5	37	Energy consumption and mix	x				p. 74
ESRS E1-5	40 to 43	Energy intensity associated with activities in high climate impact sectors	x				p. 75; 79
ESRS E1-6	44	Gross Scope 1, 2, 3 and Total GHG emissions	x	x	x		pp. 75 ff.
ESRS E1-6	53 to 55	Gross GHG emissions intensity	x	x	x		p. 76; 79
ESRS E1-7	56	GHG removals and carbon credits				x	Not material
ESRS E1-9	66	Exposure of the benchmark portfolio to climate-related physical risks			x		Not material
ESRS E1-9	66a	Disaggregation of monetary amounts by acute and chronic physical risk		x			Not material
ESRS E1-9	66c	Location of significant assets at material physical risk		x			Not material
ESRS E1-9	67c	Breakdown of the carrying value of its real estate assets by energy-efficiency classes		x			Not material
ESRS E1-9	69	Degree of exposure of the portfolio to climate-related opportunities			x		Not material
ESRS E2-4	28	Amount of each pollutant listed in Annex II of the European Pollutant Release and Transfer Register Regulation (E-PRTR) emitted to air, water and soil	x				Not material
ESRS E3-1	9	Water and marine resources	x				p. 91
ESRS E3-1	13	Dedicated policy	x				p. 91
ESRS E3-1	14	Sustainable oceans and seas	x				p. 91
ESRS E3-4	28c	Total water recycled and reused	x				p. 91
ESRS E3-4	29	Total water consumption in m3 per net revenue on own operations	x				p. 91

ESRS DISCLOSURE REQUIREMENT	ASSOCIATED DATAPOINT		SFDR REFERENCE (1)	PILLAR 3 REFERENCE (2)	BENCHMARK REGULATION REFERENCE (3)	EU CLIMATE LAW REFERENCE (4)	REFERENCE / LOCATION
ESRS 2 – SBM-3 – E4	16a		x				Not material
ESRS 2 – SBM-3 – E4	16b		x				Not material
ESRS 2 – SBM-3 – E4	16c		x				Not material
ESRS E4-2	24b	Sustainable land / agriculture practices or policies	x				p. 99
ESRS E4-2	24c	Sustainable oceans / seas practices or policies	x				p. 99
ESRS E4-2	24d	Policies to address deforestation	x				p. 99
ESRS E5-5	37d	Non-recycled waste	x				p. 107
ESRS E5-5	39	Hazardous waste and radioactive waste	x				p. 108
ESRS 2 – SBM-3 – S1	14f	Risk of incidents of forced labour	x				Not material
ESRS 2 – SBM-3 – S1	14g	Risk of incidents of forced child labour	x				Not material
ESRS S1-1	20	Human rights policy commitments	x				p. 120
ESRS S1-1	21	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8			x		p. 120
ESRS S1-1	22	Processes and measures for preventing trafficking in human beings	x				Not material
ESRS S1-1	23	Workplace accident prevention policy or management system	x				p. 120
ESRS S1-3	32c	Grievance/complaints handling mechanisms	x				pp. 122 f.
ESRS S1-14	88b + 88c	Number of fatalities and number and rate of work-related accidents	x		x		p. 129
ESRS S1-14	88e	Number of days lost to injuries, accidents, fatalities or illness	x				p. 129
ESRS S1-16	97a	Unadjusted gender pay gap	x		x		p. 130
ESRS S1-16	97b	Excessive CEO pay ratio	x				p. 130
ESRS S1-17	103a	Incidents of discrimination	x				p. 130
ESRS S1-17	104a	Non-respect of UN Guiding Principles on Business and Human Rights and OECD Guidelines	x		x		p. 130
ESRS 2 – SBM-3 – S2	11b	Significant risk of child labour or forced labour in the value chain	x				Not material
ESRS S2-1	17	Human rights policy commitments	x				Not material
ESRS S2-1	18	Policies related to value chain workers	x				Not material
ESRS S2-1	19	Non-respect of UN Guiding Principles on Business and Human Rights and OECD Guidelines	x		x		Not material
ESRS S2-1	19	Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8			x		Not material

ESRS DISCLOSURE REQUIREMENT	ASSOCIATED DATAPOINT		SFDR REFERENCE (1)	PILLAR 3 REFERENCE (2)	BENCHMARK REGULATION REFERENCE (3)	EU CLIMATE LAW REFERENCE (4)	REFERENCE / LOCATION
ESRS S2-4	36	Human rights issues and incidents connected to its upstream and downstream value chain	x				Not material
ESRS S3-1	16	Human rights policy commitments	x				Not material
ESRS S3-1	17	Non-respect of UN Guiding Principles on Business and Human Rights, ILO principles or OECD Guidelines	x		x		Not material
ESRS S3-4	36	Human rights issues and incidents	x				p. 138
ESRS S4-1	16	Policies related to consumers and end-users	x				p. 144
ESRS S4-1	17	Non-respect of UN Guiding Principles on Business and Human Rights and OECD Guidelines	x		x		Not material
ESRS S4-4	35	Human rights issues and incidents	x				Not material
ESRS G1-1	10b	United Nations Convention against Corruption	x				p. 155
ESRS G1-1	10d	Protection of whistleblowers	x				p. 155
ESRS G1-4	24a	Fines for violation of anti-corruption and anti-bribery laws	x		x		p. 157
ESRS G1-4	24b	Standards of anti-corruption and anti-bribery	x				Not material

(1) Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (OJ L 317, 9.12.2019, p. 1).

(2) Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012 (Capital Requirements Regulation) (OJ L 176, 27.6.2013, p. 1).

(3) Regulation (EU) 2016/1011 of the European Parliament and of the Council of 8 June 2016 on indices used as benchmarks in financial instruments and financial contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) No 596/2014 (OJ L 171, 29.6.2016, p. 1).

(4) Regulation (EU) 2021/1119 of the European Parliament and of the Council of 30 June 2021 establishing the framework for achieving climate neutrality and amending Regulations (EC) No 401/2009 and (EU) 2018/1999 ("European Climate Law") (OJ L 243, 9.7.2021, p. 1).

LIST OF FIGURES

IMPRINT

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The forecasts, plans and forward-looking statements contained in this report are based on the state of knowledge and the assessment of Michaeler & Partner GmbH, Sustainability & ESG business division, on behalf of **FMTG – Falkensteiner Michaeler Tourism Group AG** at the time of preparation.
No assurance can be given that forecasts and forward-looking statements, in particular those relating to financial risks and opportunities, will actually materialise.

The 2025 Sustainability Report was prepared with the greatest possible care and the data conscientiously reviewed. Rounding, transmission, typesetting and printing errors cannot, however, be entirely ruled out. This report was originally prepared in German; in case of doubt the German version prevails.

In preparing this report, AI-based tools were used in a supporting capacity, in particular for translation and language editing. All content, figures and statements were reviewed and approved by FMTG, which remains responsible for this report.

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