



DATA MODUL Aktiengesellschaft
Produktion und Vertrieb von elektronischen Systemen
Munich

- ISIN: DE0005498901 -
- WKN: 549 890 -

ANNUAL GENERAL MEETING

The shareholders of our Company are hereby invited to the

Annual General Meeting

to be held on

Thursday, 8 May 2025, at 10:00 a.m. (CEST)

at Haus der Bayerischen Wirtschaft, Max-Joseph-Straße 5, 80333 Munich, Germany.

I. Agenda

1. Presentation of the adopted annual financial statements of Data Modul AG and the approved consolidated financial statements of the Group as well as the management report for Data Modul AG and the Group, including the explanatory reports of the Executive Board on the information pursuant to sections 289a s. 1, 315a s. 1 of the German Commercial Code (*Handelsgesetzbuch, HGB*) and the essential criteria of the internal control and risk management system with regard to the financial reporting process, the proposal of the Executive Board for the appropriation of the balance sheet profit as well as the Report of the Supervisory Board for the financial year 2024

The Supervisory Board has approved the annual financial statements prepared by the Executive Board and the consolidated financial statements of the Group. The annual financial statements have thereby been approved pursuant to section 172 sentence 1 of the German Stock Corporation Act (*Aktiengesetz, AktG*). An approval by the Annual General Meeting is thus not required.

As of the calling of the Annual General Meeting, the documents are available on our website at

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>

In addition, all documents to be provided will be available during the Annual General Meeting and will be explained in more detail at the Annual General Meeting.

2. Resolution on the appropriation of the balance sheet profit

The Executive Board and the Supervisory Board propose that the balance sheet profit for the financial year 2024 in the amount of EUR 75,296,772.15 as set out in the annual financial statements of the Company, be appropriated as follows:

Payment of a dividend to the shareholders (EUR 0.75 per no-par-value share entitled to a dividend)	EUR	2,644,636.50
Allocation to other revenue reserves	EUR	40,000,000.00
Profits carried forward	EUR	32,652,135.65
Balance sheet profit	EUR	75,296,772.15

In accordance with section 58 para. 4 sentence 2 AktG, the dividend is due on the third business day following the resolution by the Annual General Meeting, *i.e.* on 13 May 2025.

3. Resolution on the discharge of the actions of the Executive Board member for the financial year 2024

The Executive Board and the Supervisory Board propose that the acts of the Executive Board member holding office in the financial year 2024 be formally approved for the financial year 2024.

4. Resolution on the discharge of the actions of the Supervisory Board members for the financial year 2024

The Executive Board and the Supervisory Board propose that the acts of the Supervisory Board members holding office in the financial year 2024 be formally approved for the financial year 2024.

5. Resolution on the appointment of the public auditor for the financial year 2025

The Supervisory Board proposes that Forvis Mazars GmbH & Co. KG, Wirtschaftsprüfungsgesellschaft, Steuerberatungsgesellschaft, Hamburg, be appointed auditor and Group auditor for the financial year 2025.

The Supervisory Board's proposal is free of undue influence from any third party. Nor were there any rules that would have restricted the Company's freedom to select in the meaning of the EU Audit Regulation (Regulation (EU) No. 537/2014 of the European Parliament and Council of 16 April 2014).

6. Election to the Supervisory Board

By resolution dated August 12, 2024, the Munich Local Court appointed Mr. Sales Rampersad as a member of the company's Supervisory Board. Mr. Rampersad shall now be proposed to the Annual General Meeting for ordinary election.

In accordance with Sections 95 sentence 1, 96 para. 1, 101 para. 1 AktG, Section 1 para. 1, no. 1 sentence 2 German One-Third Participation Act (*Drittelbeteiligungsgesetz, DrittelbG*) in conjunction with Section 8 para. 1 of the company's Articles of Association, the Supervisory Board consists of three members, one of whom is an employee representative and two of whom are shareholder representatives.

The Supervisory Board's election proposal is in line with the competence profile of the Supervisory Board, its diversity concept and the objectives it has set for its composition. It complies with the recommendations of the German Corporate Governance Code (*Deutscher Corporate Governance Kodex, DKGK*). The Annual General Meeting is not bound by election proposals when electing shareholder representatives.

The Supervisory Board proposes,

Mr. Sales Rampersad, resident in Centennial/Colorado, USA, profession: Global President, Intelligent Solutions, Arrow Electronics, Inc.

be elected as a shareholder representative on the company's Supervisory Board with effect from the end of the company's Annual General Meeting on May 8, 2025 until the end of the Annual General Meeting that resolves on the discharge of the members of the Supervisory Board for the 2029 financial year.

Mr. Rampersad does not hold any mandates in other statutory supervisory boards or in comparable domestic and foreign supervisory bodies of commercial business enterprises.

In accordance with lit. C 13 of the German Corporate Governance Code, the Supervisory Board points out that Mr. Rampersad holds a management position at a company of the Arrow Group. Arrow Central Europe Holding Munich GmbH, a company of the Arrow Group, is a shareholder with a significant stake in the company.

Mr. Rampersad's *curriculum vitae* can be found at the end of this invitation and on the Internet at

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>

and – together with the *curricula vitae* of the other Supervisory Board members – updated annually on the company's website at

<https://www.data-modul.com/en/company/investor-relations/corporate-governance>

7. Resolution on the approval of the compensation report

Pursuant to section 162 AktG, Executive Board and Supervisory Board shall prepare a compensation report and submit this report to the Annual General Meeting for approval pursuant to section 120a para. 4 AktG.

The compensation report was audited by the auditor of the Company pursuant to section 162 para. 3 AktG. The audit opinion is attached to the compensation report.

The compensation report including audit opinion is set out in section II. of this invitation and is also available on our website at

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>

from the time the Annual General Meeting is convened.

The Executive Board and the Supervisory Board propose to approve the compensation report for the fiscal year 2024 prepared and audited pursuant to section 162 AktG.

8. Resolution on the approval of the remuneration of the Supervisory Board members

According to Section 113 para. 3 AktG in the version amended by the Act Implementing the Second Shareholders' Rights Directive (*ARUG II*), the Annual General Meeting of listed companies shall resolve on the remuneration of the Supervisory Board members at least every four years, whereby a resolution confirming the remuneration is permissible.

The remuneration of Supervisory Board members is regulated in Section 8 para. 5 of the company's Articles of Association. Pursuant to that provision, the members of the Supervisory Board are entitled to a fixed remuneration payable after the end of the financial year. Attendance fees are not paid.

In the opinion of the Management Board and Supervisory Board, the remuneration set out in Section 8 para. 5 of the company's Articles of Association and the current remuneration system for the Supervisory Board members are still appropriate and should remain unchanged.

In particular, the current remuneration provisions take into account the recommendation in G.17 DCGK and the suggestion in G.18 DCGK. The remuneration for Supervisory Board members set out in Section 8 para. 5 of the company's Articles of Association is described under III.

The Management Board and Supervisory Board therefore propose that the remuneration of Supervisory Board members as set out in Section 8 para. 5 of the company's Articles

of Association and the current remuneration system for Supervisory Board members be confirmed.

II. Compensation report (see agenda item 7)

The following compensation report pursuant to section 162 AktG outlines and explains the compensation individually granted and/or due in the fiscal year 2024 to current and former members of the Executive Board and Supervisory Board of DATA MODUL AG.

The compensation report for the previous fiscal year 2023 was approved by the Annual General Meeting of the Company on 8 May 2024. The compensation system approved by the Annual General Meeting of the Company on 9 May 2023 pursuant to section 120a para. 1 AktG has been observed in this compensation report.

A. Compensation of the Executive Board

Compensation system for Executive Board members

On 23 March 2023, pursuant to sections 87 para. 1, 87a para. 1 AktG, the Supervisory Board resolved on changes to the previously applicable compensation system for the Executive Board as approved by the Annual General Meeting on 6 May 2021. The changes are effective as from 1 January 2023.

On 9 May 2023, the compensation system was submitted to the Annual General Meeting pursuant to section 120a para. 1 AktG and approved by the required majority vote.

In the fiscal year 2024, the Supervisory Board did not make use of any of the options established in the compensation system to deviate temporarily from the compensation system.

Overview of the compensation system

The compensation of Executive Board members of DATA MODUL AG is based on its size and global activities, its business and financial position, its profitability, and its prospects as well as the amount and structure of Executive Board compensation of comparable companies in and outside Germany.

In addition, the responsibilities and personal performance of the Executive Board are taken into account.

The compensation structure is designed to be competitive and to provide an incentive for successful work for sustainable corporate development.

The following chart presents the components of the compensation system as well as the annual target amounts. Thereafter, the components, and how they were actually applied in the fiscal year 2024, are explained in detail.

Fixed components

1.	Basic salary	Annual target amount: EUR 250,000.00
2.	Bonus for retention	Annual target amount: EUR 100,000.00
3.	Fringe benefits	Annual target amount: EUR 20,000.00

Performance-based components

1.	EBIT-related executive bonus	Annual target amount: EUR 250,000.00
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The annual target amounts may be exceeded up to the amount of the maximum compensation.

Compensation components in detail

The basic salary is a fixed annual salary, payable in twelve equal instalments at the end of each calendar month.

As an appreciation for his loyalty to the group, the Company grants the sole Executive Board member a bonus payment in the amount of EUR 100,000.00, if he is still employed by the Company at the end of the fiscal year.

The fringe benefits mainly consist of the provision of a company car, contribution subsidies for accident, life and health insurance and the inclusion in the D&O insurance policy.

No company pension commitments have been made with regard to the sole Executive Board member.

The performance-based variable compensation in the form of the executive bonus depends on the attainment of certain financial targets. The executive bonus is an incentive for the contribution made by the Executive Board to the implementation of DATA MODUL AG's business strategy in the respective fiscal year.

To ensure that the executive bonus has a long-term incentive effect, only 2/3 of the executive bonus will be paid out after adoption of the annual financial statements and approval of the consolidated financial statements for the past fiscal year. The outstanding 1/3 of the executive bonus is only paid out in the following fiscal year if the DATA MODUL Group continues to develop positively.

The basis for calculating the executive bonus is the EBIT of the DATA MODUL Group, as reported in the consolidated financial statements for the past fiscal year.

The amount of the executive bonus paid out is staggered and depends on the percentage of DATA MODUL Group's actual EBIT compared with DATA MODUL Group's budgeted EBIT. The maximum executive bonus payout amounts to EUR 250,000 if targets are met 100%. Before the beginning of the respective fiscal year, the Supervisory Board approves a budgeted EBIT figure for DATA MODUL Group.

The figures reported in the adopted consolidated financial statements of the Company for the respective past fiscal year are decisive for the actual EBIT achieved by DATA MODUL Group.

If the EBIT performance exceeds the EBIT target by up to 200%, the Executive Board member is entitled to a performance bonus of up to EUR 250,000. The amount paid out as a performance bonus depends on the percentage of the DATA MODUL Group's actual EBIT in relation to the DATA MODUL Group's planned EBIT.

Observance of the maximum compensation

The Supervisory Board has determined that the total compensation that an Executive Board member can receive in a fiscal year under the current compensation system may not exceed an amount of EUR 870,000.00 (maximum compensation). This is ensured by a cap on the variable compensation. The sole Executive Board member observed and undercut the maximum compensation in the fiscal year 2024 with regard to the granted and/or due fixed and variable compensation.

Review of the appropriateness

The Supervisory Board regularly reviews the appropriateness and the conventionality of the Executive Board's compensation. The Supervisory Board includes companies from the Company's sector as well as other companies listed in the Prime Standard. In addition, the Supervisory Board considers the compensation of the senior management team and the total number of employees of DATA MODUL Group.

Executive Board compensation individually disclosed

Compensation of the sole Executive Board member

The following chart presents the fixed and variable compensation components granted and/or due in the fiscal year 2024 to the sole Executive Board member, including their relative share, pursuant to section 162 AktG and states the comparative values for the fiscal years 2022 and 2023. The actual compensation includes the basic annual salary paid out in the fiscal year 2024, the fringe benefits accrued in the fiscal year 2024, the retention bonus paid out in the fiscal year 2024, 2/3 of the executive bonus based on EBIT for the fiscal year 2023 and 1/3 of the executive bonus based on EBIT for the fiscal year 2022 as well as the performance bonus for the fiscal year 2023, paid out in the fiscal year 2024.

Dr. Florian Pesahl CEO since 1 January 2010							
		2022		2023		2024	
		in kEUR	in % ¹	in kEUR	in %	in kEUR	in %
Fixed compensation	Basic salary	230	35	250	31	230 ²	36
	Fringe benefits	18	3	19	2	19	3
	Retention bonus	100	16	100	13	100	16
Subtotal		348	54	369	46	349	54
Performance-based compensation	EBIT-related executive bonus (2/3)	147	23	147	18	167	26
	EBIT-related executive bonus (1/3)	37	6	73	9	73	11
	Discretionary bonus / performance bonus	110	17	220	27	55	9
Subtotal		294	46	404	54	295	46
Total compensation		642	100	809	100	644	100

Compensation of former Executive Board members

The following chart contains the fixed and variable compensation components granted and/or due in the fiscal year 2024 to former Executive Board members who have termi-

¹ The relative share relates to the total compensation shown at the bottom of the chart.

² Dr. Pesahl voluntarily waived 10% of his fixed remuneration during the weeks of short-time working in the 2024 financial year.

nated their activity within the last ten fiscal years, including their relative share, pursuant to section 162 AktG. The actual compensation includes company pensions paid out in the fiscal year 2024.

	Peter Hecktor (terminated his activity in the fiscal year 2014)					
	2022		2023		2024	
	in kEUR	in %	in kEUR	in %	in kEUR	in %
Company pension paid out	25	100	26	100	27	100
Sum	25	100	26	100	27	100

In addition, a widow's pension in the amount of kEUR 19 was paid in the fiscal year 2024 to the wife of a deceased former Executive Board member who had terminated his activity more than ten years ago.

Clawback of variable compensation components

In the fiscal year 2024, the Supervisory Board did not find any cause to make use of the option provided for under the compensation system to claw-back variable compensation components.

Third-party benefits and termination benefits

In the fiscal year 2024, no third-party benefits or loans were granted to the sole Executive Board member, nor were any similar benefits granted. The sole Executive Board member does not receive any compensation from mandates for group companies.

There are no contractual agreements with the sole Executive Board member regarding the procedure in the event of premature termination of the Executive Board member's contract without good cause. The Supervisory Board is of the opinion that this is not appropriate because the Executive Board generally has no influence on a termination decision without good cause.

There is a severance payment provision in the event of a change of control at DATA MODUL AG amounting to a maximum of two years' compensation.

B. Compensation of the Supervisory Board

Compensation system for Supervisory Board members

Pursuant to section 113 para. 3 AktG, the Annual General Meeting of listed stock corporations shall resolve on the compensation of Supervisory Board members at least every four years.

Accordingly, on 6 May 2021, the Annual General Meeting confirmed the compensation of Supervisory Board members, as set forth in section 8 para. 5 of the articles of association of DATA MODUL AG, and the applicable compensation system for Supervisory Board members.

Overview of the compensation system

Pursuant to section 8 para. 5 of the articles of association of DATA MODUL, the Supervisory Board members receive a fixed annual compensation payable following the close of the fiscal year.

For individual Supervisory Board members, the annual fixed compensation amounts to EUR 20,000.00, the chairman receives twice this amount, and the deputy chairman receives 1.5 times this amount. Attendance fees are not paid.

In the fiscal year 2024, the compensation system for DATA MODUL AG's Supervisory Board was applied in all aspects as set forth in section 8 para. 5 of the articles of association.

Supervisory Board compensation individually disclosed

The following chart presents the fixed and variable compensation components granted and/or due in the fiscal year 2024 to the Supervisory Board members, including their relative share, pursuant to section 162 AktG. The actual compensation includes the annual fixed compensation paid out in the fiscal year 2024.

	Fixed compensation	
	in kEUR	in %
Kristin D. Russell ³	24	100
Total compensation	24	100
Richard A. Seidlitz	34	100
Total compensation	34	100
Eberhard Kurz	20	100
Total compensation	20	100
Salesh Rampersad ⁴	12	100
Total compensation	12	100
In total	90	

Supervisory Board members are reimbursed for their expenses incurred in connection with the performance of their office and for any value-added tax payable on their compensation.

Supervisory Board members do not receive loans from the Company.

C. D&O Insurance

The Company provides D&O insurance for Group board members. The insurance covers personal liability in cases of claims brought against insured persons in connection with the performance of their duties. The insurance policy for the fiscal year 2024 stipulates a deductible for the Executive Board member in line with the German Stock Corporation Act and German Corporate Governance Code.

D. Comparative chart of changes in compensation and company performance

The following chart presents the annual change of the compensation granted and/or due to current and former Executive Board and Supervisory Board members, DATA MODUL AG's earnings performance and the compensation awarded to employees on a full-time equivalent basis, with the latter being based on the average wages and salaries of the employees of Group companies in Germany. In accordance with section 26j para. 2 sentence 2 EGAktG, the comparison presented begins with the financial year 2021.

³ Ms. Russell resigned from her position as a member of the Supervisory Board with immediate effect on July 17, 2024.

⁴ Mr. Rampersad was appointed as a member of the Supervisory Board by order of the Munich Local Court on 12 August 2024.

		2021 in kEUR	2022 in kEUR	2023 in kEUR	2024 in kEUR	Δ in %
Executive Board	Dr. Florian Pesahl	636	642	809	644	-20
	Peter Hecktor	24	25	26	27	4
Supervisory Board	Kristin D. Russell (chairwomen until 12 August 2024)	40	40	40	24	-40
	Rick Seidlitz (deputy chairman until 12 August 2024 and chairman from 12 August 2024)	30	30	30	34	13
	Eberhard Kurz	20	20	20	20	0
	Salesh Rampersad (deputy chairman from 12 August 2024)	-	-	-	12	100
Employees	Average employee salary in Germany on full-time equivalent basis	56	58	60	63	5
Company performance	EBIT of DATA MODUL Group according to IFRS (in EUR million)	13	27	22	9	-59

***For the Executive Board
Dr. Florian Pesahl
CEO
of DATA MODUL AG***

***For the Supervisory Board
Richard A. Seidlitz
Chairman of the Supervisory Board
of DATA MODUL AG***

Independent auditor's report

To DATA MODUL Aktiengesellschaft Produktion und Vertrieb von elektronischen Systemen, Munich

Audit opinion

We have formally audited the remuneration report of DATA MODUL Aktiengesellschaft Produktion und Vertrieb von elektronischen Systemen, Munich for the financial year from 1 January to 31 December 2024 to determine whether the disclosures pursuant to § 162 (1) and (2) German Stock Corporation Act (*Aktiengesetz*, AktG) have been presented in the remuneration report. In accordance with § 162 (3) AktG, we have not audited the content of the remuneration report.

According to our assessment, the enclosed remuneration report provides, in all material respects, the information required by § 162 (1) and (2) AktG. Our audit opinion does not cover the content of the remuneration report.

Basis for the audit opinion

We conducted our audit of the remuneration report in accordance with § 162 (3) AktG and in compliance with the IDW auditing standard: The audit of the remuneration report (*Die Prüfung des Vergütungsberichts*) in accordance with § 162 (3) AktG (IDW PS 870 (09.2023)). Our responsibility pursuant to that provision and standard is further described in the section "Responsibility of the auditor" of our report.

As an auditing firm, we have applied the requirements of the International Standard on Quality Management (ISQM 1). We have complied with the professional duties pursuant to the German Auditors' Code (*Wirtschaftsprüferordnung*) and the professional statutes for auditors/sworn auditors (*Berufssatzung für Wirtschaftsprüfer/vereidigte Buchprüfer*), including the requirements of independence.

Responsibility of the management board and supervisory board

The management board and the supervisory board are responsible for the preparation of the remuneration report, including the related disclosures, which complies with the requirements of § 162 AktG. Furthermore, they are responsible for the internal controls that they determine are necessary to enable the compilation of a remuneration report, including the related disclosures, that is free from material misstatement, whether due to fraud or error.

Responsibility of the auditor

Our objective is to obtain reasonable assurance about whether the disclosures pursuant to § 162 (1) and (2) AktG in the remuneration report have been made in all material respects, and to express an opinion thereon in a report.

We planned and performed our audit to obtain evidence about the formal completeness of the remuneration report by comparing the disclosures made in the remuneration report with the disclosures required by § 162 (1) and (2) AktG. In accordance with § 162 (3) AktG, we have not audited the accuracy of the content of the disclosures, the completeness of the content of the individual disclosures or the adequate presentation of the remuneration report.

Dealing with any misleading representations

In connection with our audit, we have a responsibility to read the remuneration report, taking into account the knowledge gained from the audit of the financial statements, and to remain alert for indications as to whether the remuneration report contains misleading representations as to the accuracy of the content of the disclosures, the completeness of the content of the individual disclosures or the fair presentation of the remuneration report.

If, based on the work we have performed, we conclude that such misleading representation exists, we are required to report that fact. We have nothing to report in this regard.

Munich, 20 March 2025

Forvis Mazars GmbH & Co. KG
Wirtschaftsprüfungsgesellschaft
Steuerberatungsgesellschaft

In the original German version signed by:

Christian Schönhofer
Wirtschaftsprüfer
(German Public Auditor)

Stanimir Ivanov
Wirtschaftsprüfer
(German Public Auditor)

III. Remuneration of the members of the Supervisory Board (see agenda item 8)

Section 8 para. 5 of the company's Articles of Association reads as follows:

"The members of the Supervisory Board each receive a fixed remuneration of EUR 20,000.00 payable after the end of the financial year. The Chairman receives twice this amount and the Deputy Chairman receives 1 1/2 times this amount. Supervisory Board members who have only belonged to the Supervisory Board for part of the financial year receive this remuneration pro rata temporis. Any value added tax payable on the remuneration of the Supervisory Board members shall be additionally reimbursed by the company."

IV. Participation in the Annual General Meeting and exercise of voting rights

The right to participate in and exercise their voting rights at the Annual General Meeting have those shareholders who have registered to that purpose with the Company and transmitted to the Company a specific record of their shareholdings pursuant to section 13 para. 3 of the Articles of Association.

Proof of entitlement shall be furnished by a record of shareholding in text form issued by the ultimate intermediary pursuant to section 67c para. 3 AktG. The record of shareholding must refer to the close of business of the 22nd day prior to the Annual General Meeting. This is 16 April 2025, midnight (CEST) (record date).

The registration and the record of shareholding must be prepared in the German or English language and must be received by the Company in text form by 1 May 2025, midnight (CEST), at the latest via one the following channels:

Data Modul AG
c/o Computershare Operations Center
80249 Munich
E-Mail: anmeldestelle@computershare.de

Registration for the Annual General Meeting, voting (also by proxy) and the authorization of third parties can also be transmitted to the company via intermediaries in accordance with SRD II in conjunction with the Implementing Regulation (EU 2018/1212) in ISO 20022 format (e.g. via SWIFT, CMDHDEMMXXX) pursuant to Section 67c AktG. Authorization via the SWIFT Relationship Management Application (RMA) is required for registration via SWIFT.

V. Significance of the record date

The entitlement to participate in the Annual General Meeting and the scope of the voting rights are exclusively determined by the shareholding owned by the respective shareholder on the record date. Changes in the shareholding following the record date will not affect the entitlement to participate in the Annual General Meeting and the scope of vot-

ing rights. The record date is not equivalent to a ban on the sale of shares. Persons who do not own any shares on the record date and become shareholders only after the record date are not entitled to participate in the Annual General Meeting or to exercise voting rights, insofar as they do not act as authorized representatives. The record date does not constitute a relevant date with respect to the dividend entitlement.

VI. Procedures for proxy voting

Duly registered shareholders may have their voting and other rights exercised by proxy of their choice, *e.g.* an intermediary, a shareholders' association, a voting advisor or another authorized third party, after granting the appropriate power of attorney.

If a shareholder authorizes more than one person, the Company may reject one or several of them pursuant to section 134 para. 3 s. 2 AktG.

The power of attorney may be granted by declaration to the proxy or to the Company. The granting of such proxy, its revocation and the provision of proof *vis-à-vis* the Company for the granting of power of attorney require text form (section 126b BGB). Shareholders are requested to use the form they receive together with the admission ticket to grant the power of attorney.

The power of attorney may be issued *vis-à-vis* the Company no later than Wednesday, 7 May 2025, midnight (CEST) (receipt decisive), using the following e-mail-address:

anmeldestelle@computershare.de

The same applies to the revocation of a power of attorney and the proof of a power of attorney granted to the proxy.

In case of authorization of intermediaries, voting rights advisors, shareholders' associations or other persons acting in a business capacity pursuant to Section 135 AktG (authorization pursuant to section 135 AktG), special statutory provisions apply, in particular section 135 AktG. Shareholders who wish to grant power of attorney pursuant to section 135 AktG are requested to consult with the person to be granted power of attorney on the procedure and form of the power of attorney.

VII. Shares and voting rights

As of the calling of the Annual General Meeting 2025, the nominal share capital of the Company amounts to EUR 10,578,546.00 and is divided into 3,526,182 ordinary bearer shares without par value. Each share without par value grants one vote. The total number of voting rights in the Company corresponds to the total number of shares and therefore amounts to 3,526,182 voting rights at the time of calling of the Annual General Meeting.

VIII. Rights of the shareholders

Request to amend the agenda

Shareholders whose shareholdings in aggregate represent 5% of the nominal share capital or a proportionate amount of EUR 500,000.00 of the nominal share capital may request that items be included in the agenda and published.

Each new item must be substantiated or accompanied by the wording of the proposed resolution. The request is to be addressed in writing to the Executive Board of the Com-

pany and must be received by the Company at least 30 days prior to the Annual General Meeting. In this respect, the day of receipt shall not be counted. Thus, the last permissible day of receipt is 7 April 2025, midnight (CEST).

The following address is to be used for the transmission of requests for supplements to the agenda:

Executive Board of Data Modul AG
Investor Relations
Landsberger Str. 322
80687 Munich
Germany

In accordance with section 122 para. 2 and para. 1 AktG, the shareholders concerned must verify that they have owned the above-mentioned minimum number of shares for at least 90 days prior to the receipt of the demand and that they will hold the shares until a decision is reached by the Executive Board with respect to the application. For the purposes of calculating the time limit referred to above, section 121 para. 7 AktG will be applied accordingly.

Counter-motions and election proposals

Each shareholder is entitled to make counter-motions regarding individual agenda items or election proposals. Counter-motions must be accompanied by a statement of grounds for the motion.

The Company will make available motions of shareholders, including the respective shareholder's name, a statement of grounds for the motion and any statements of the management, on the internet at

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>

provided that the shareholder has sent a counter-motion to the Company against a proposal of the Executive Board and the Supervisory Board with respect to a certain agenda item, including a statement of grounds for the counter-motion, no later than 14 days prior to the Annual General Meeting. In this respect, the day of receipt shall not be counted. Thus, the last permissible day of receipt is 23 April 2025, midnight (CEST).

These requirements apply *mutatis mutandis* to election proposals. Election proposals do not need to be substantiated. In addition to the cases referred to in section 126 para. 2 AktG, the Executive Board is also not required to make available election proposals of shareholders if they do not include the disclosures referred to in section 124 para. 3 sentence 4 AktG (name, exercised profession and place of residence) and section 125 para. 1 sentence 5 AktG (membership on other statutorily established supervisory boards).

The following address fax-number or e-mail address is to be used for the transmission of counter-motions and election proposals:

Data Modul AG
Investor Relations
Landsberger Str. 322
80687 Munich
Germany
E-Mail: hv@data-modul.com

The right of each shareholder to make counter-motions and election proposals during the Annual General Meeting regarding the various agenda items, even without prior communication to the Company, remains unaffected.

Shareholders' information rights

In the Annual General Meeting, pursuant to section 131 para. 1 AktG, each shareholder may request from the Executive Board information on the matters of the Company to the extent that such information is necessary to permit a proper evaluation of the relevant agenda item. This right to information also extends to the Company's legal and business relationships with an affiliated company. The Executive Board may refuse to provide information under the conditions set forth in section 131 para. 3 AktG. An explanation of the conditions under which the Executive Board may refuse to provide information is available at the Company's website under

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>.

IX. Information contained on the website of the Company

The present calling of the Annual General Meeting, the documents to be made available and motions of shareholders as well as further information is also available at the website of the Company under

<https://www.data-modul.com/en/company/investor-relations/annual-general-meeting>.

X. Data protection information

The following data protection information is designed to inform the shareholders about the processing of their personal data in connection with the preparation and holding of as well as follow-up the Annual General Meeting and their rights regarding such processing.

Responsible entity, purposes and legal basis of the processing

The Company is the responsible entity for data processing.

The Company uses personal data of its shareholders and any shareholder representatives to enable the shareholders and shareholder representatives to participate in and exercise their rights before and during the Annual General Meeting. In addition, personal data will be used for related purposes and to satisfy other statutory requirements (e.g., relating to documentary evidence or record retention).

The legal basis for the processing is Art. 6 para. 1 sentence 1 lit. c) EU General Data Protection Regulation.

Recipients of personal data

The Company is using external service providers and advisors to prepare, hold and follow up the Annual General Meeting. Service providers and advisors will receive from the Company only such personal data as are required for the execution of the service and will process the data exclusively in accordance with the Company's instructions. In addition, shareholders and shareholder representatives may inspect the list of participants to be made accessible at the Annual General Meeting.

Storage period

Personal data will be stored as long as this is required by law or the Company has a legitimate interest in the storage of such data, such as in the case of judicial or extrajudicial proceedings in connection with the Annual General Meeting. The personal data will then be deleted.

Rights

Subject to the statutory requirements, shareholders have the right to receive information about the processing of their personal data, to require rectification or erasure of their personal data or the restriction of the processing and to receive your personal data in a structured, commonly used and machine-readable format (data portability).

Subject to the statutory requirements, shareholders have the right to object to the processing of their personal data.

Shareholders also have the right to lodge a complaint with a supervisory authority.

Contact details

Contact details of the Company are:

Data Modul AG
Landsberger Str. 322
80687 Munich

Contact details of the Data Protection Officer are:

Data Modul AG
Data Protection Officer
Landsberger Str. 322
80687 Munich
e-mail: Datenschutz@data-modul.com

Munich, March 2025

The Executive Board